

Appendix 6
Question 9 to
Question 11

Report Settings Summary

Event	Local Plan Issues & Options November 2017
Total Responses	22,707
Total Respondents	2,376
Filtered Responses	787
Filtered Respondents	650
Questions	<p>Question 9</p> <p>Do you agree with the proposed approach to Green Belt and Major Developed Sites summarised above?</p> <p>Yes/ No</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)	ID-4764246-QUESTION-9
Pivot	<i>(none)</i>
Document Name	Question 9 - Summary Report
Created on	2019-04-17 07:27:16
Created by	Strategic Planning Admin

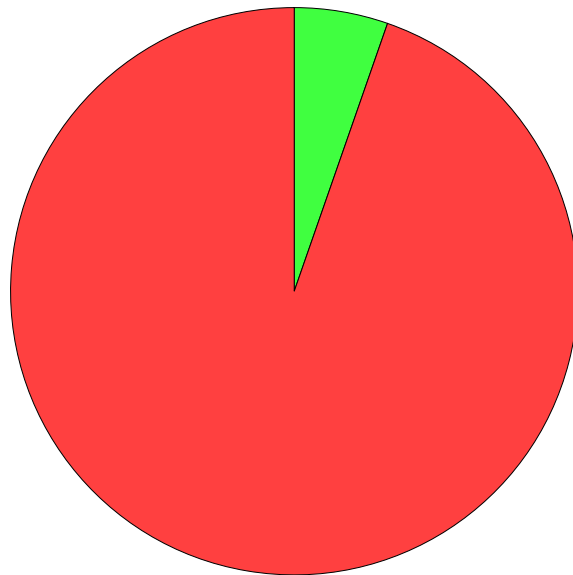
Your Opinion

Question responses: **787 (100.00%)**

Question 9

Do you agree with the proposed approach to Green Belt and Major Developed Sites summarised above?

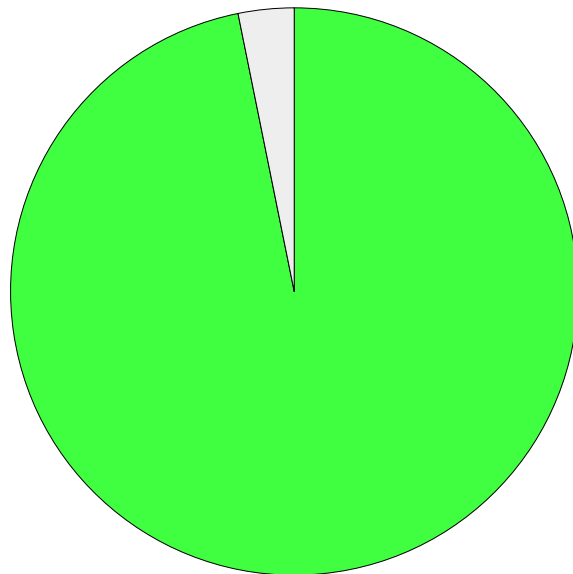
Yes/ No



	% Total	% Answer	Count
■ Yes	5.34%	5.34%	42
■ No	94.66%	94.66%	745
Total	100.00%	100.00%	787

Responses

Question responses: **762 (96.82%)**



	% Total	% Answer	Count
Responses	96.82%	100.00%	762
No Response	3.18%	--	25
Total	100.00%	100.00%	787

Supporting evidence

Question responses: **15 (1.91%)**



	% Total	% Answer	Count
■ Responses with File(s) Uploaded	1.91%	100.00%	15
■ Responses with No Uploads	98.09%	--	772
Total	100.00%	100.00%	787

Issues and Options All Responses to Question 9

Number	Question 9
ID	LPIO33
Full Name	rosie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Yes to using Brown Belt and No to Using Green Belt this is part of what keeps us unique and not one big spawl. The green belt has a lot of hidden treasures such as Cow slip that are being dug up and built over.
Include files	
Number	Question 9
ID	LPIO36
Full Name	Mr David Munnery
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I do not agree with eroding the Green Belt which threatens urban sprawl.
Include files	
Number	Question 9
ID	LPIO78
Full Name	Mr John Lilley
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 9
ID	LPIO123
Full Name	Mrs Lynne Head
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 9
ID	LPIO138
Full Name	mr Mark Bracewell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No building on Green belt. Whats the point of designating it Green belt if you then build on it?
Include files	
Number	Question 9
ID	LPIO148
Full Name	Mrs Rebecca Sterling
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 green belt is of great importance and shouldn't be developed for housing.</p> <p>In particular for kings Langley there are 3 farm sites in the green belt that should be protected to keep the village as a village.</p> <p>The national planning policy framework states that the green belt should serve the following purposes. 4 of these 5 are relevant to the proposal so state these as Dacorum must follow these points.</p> <ul style="list-style-type: none"> - check restricted sprawl of large built up areas. So we need to keep kings Langley as a village separate from Hemel/apsley. - prevent neighbouring towns merging into one another - assist in safeguarding countryside from encroachment. <p>Three farms clearly constitute encroachment on countryside</p> <ul style="list-style-type: none"> - preserve setting and special character of historic towns. <p>Clearly kings Langley is a special village with a medieval</p>

	history which would be lost if becomes amalgamation of Hemel and Watford.
Include files	
Number	Question 9
ID	LPIO163
Full Name	Mr John Shaw
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 green belt should not be developed for housing under any circumstances.</p> <p>The farm sites around Kings Langley are working farms in the green belt which are essential to prevent the village from merging in to adjacent towns.</p>
Include files	
Number	Question 9
ID	LPIO192
Full Name	Mr Andrew Levy
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 greenbelt is essential for preventing accidental merger between towns and villages. In particular any development of greenbelt sites in Kings Langley (including Shendish which DBC wrongly insists on including with Hemel Hempstead) would effectively join Kings Langley to Hemel on one side or potentially Watford on the other. This is directly in conflict with the role of greenbelt as set out in the ~National Planning Policy Framework. It would create an ugly sprawl, destroy the integrity of Kings Langley as a separate entity and destroy its status as a village.</p>
Include files	
Number	Question 9
ID	LPIO211
Full Name	Mr Martin Cotton
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Oh dear. The problem is that developers love Green Belt land, as it gives them a blank canvas, and allows them to maximise their profits. Somewhere else in this document there is reference to DBC not wanting to engage in expensive planning appeal cases. Whilst developers still have deep pockets, you can never win, unless the bar is set higher in the first place.
Include files	
Number	Question 9
ID	LPIO241
Full Name	Mr Lloyd Moore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt was introduced for a reason; to protect areas from urban sprawl. There is no point designating areas as Green Belt if you then build on it, it defeats the object. Only a tiny fraction of UK's land is developed so there are other areas that could be used for housing.
Include files	
Number	Question 9
ID	LPIO243
Full Name	Mrs Jill Moore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Why have Green Belt if you then develop it when times get tough? I would suggest building on part of the 99.9% of the UK that has not been developed.
Include files	
Number	Question 9
ID	LPIO247
Full Name	Miss Jennifer Moore
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We have green belt for a reason.
Include files	
Number	Question 9
ID	LPIO251
Full Name	Miss Jennifer Moore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt is to prevent urban sprawl. It should never be built on.
Include files	
Number	Question 9
ID	LPIO259
Full Name	Ms Cheryl Hall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt is there for a reason. The green areas are the 'lungs of London,' helping to clean the air. I would feel very let down by DBC if they allowed building on the greenbelt surrounding Kings Langley.
Include files	
Number	Question 9
ID	LPIO272
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt is, by definition, to prevent urban sprawl and not a label to be readjusted when suits. Kings Langley

	<p>and other villages, have boundaries for a reason - to suggest these boundaries are neither fixed nor to be protected, makes a mockery of any Conservation or Green Policy the current Borough Council, County Council or Central Government might have.</p> <p>There are plenty of brownfield sites within the borough, closer to more appropriate and existing infrastructure, which should be in the mix - yet seem to have been omitted. One can only ask the question of why?</p>
Include files	
Number	Question 9
ID	LPIO290
Full Name	Ms Jane Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt is there for a reason - don't build on it. The council have already declassified land on the way out of Tring towards Aylesbury and this will have 500 more homes but no sign of improved infrastructure. If it becomes acceptable to build on green belt it will all be gone and future generations will not benefit as we do.
Include files	
Number	Question 9
ID	LPIO310
Full Name	Mr Robert Spence
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Your paragraph 5.2.2 above " We can amend Green Belt boundaries, but in order to do this we need to show that there are 'exceptional circumstances".</p> <p>Building houses by private developers for commercial gain can in no way be classed as "Exceptional circumstances".</p>
Include files	
Number	Question 9
ID	LPIO324
Full Name	Mr David Stanier
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Section 5.2.2 requires exceptional circumstances to allow building on the Green Belt ... and this has not been shown
Include files	
Number	Question 9
ID	LPIO369
Full Name	Mr Michael Bouvier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No building on Green Belt, address the current deficiencies in the infrastructure - particularly roads and hospital BEFORE pressing ahead with thousands of new homes.
Include files	
Number	Question 9
ID	LPIO390
Full Name	Ms Penny Gore
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 do not agree with Green Belt being built on in any circumstances. It is there for a very good reason, as you acknowledge in your own remarks.</p> <p>I'd also like to refer specifically to the proposals for the sites around Piccotts End, HH-h1a/b and HH-h2. You explain above:</p> <p>'We commissioned a Green Belt Review (Stage 1, November 2013) which considers all the Green Belt in Dacorum. This is supported by a further Green Belt Review and Landscape Appraisal (Stage 2, January 2016) which considers the Green Belt adjoining our main settlements. The studies break the Green Belt into parcels and assess these against nationally set criteria. The Stage 2 study also considers the wider issue of landscape setting.</p>

	<p>5.2.4 The studies conclude that most of our Green Belt meets the Government's criteria for designation. There are however a few areas which don't meet all of the criteria and so could have their Green Belt designation removed. This could allow planned development to then take place.'</p> <p>I refer you to the schedule of site appraisals which clearly states that the Stage 2 Green Belt Review recommended that HH-h1a, HH-h1b and HH-h2 should ALL be excluded from further settlement and retained as Green Belt.</p> <p>It seems quite plain to me that none of these sites should be considered further as suitable for development in any way.</p>
Include files	
Number	Question 9
ID	LPIO447
Full Name	Ms Julia Marshall
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 guiding principle should remain no developments on greenbelt unless there are exceptional circumstances.</p> <p>It is my fear that any attempt to water this down will result in the council being unable to defend its policies against ANY development in the greenbelt. This precedent will result in many more developments, as developers will point to development on greenbelt WITHOUT exceptional circumstances and even if initially denied permission, they will win at appeal.</p>
Include files	
Number	Question 9
ID	LPIO484
Full Name	Susan Justice
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>One of the purposes of the green belt is to keep the individual towns and villages separate so that their characters can be retained. People have chosen to live in the smaller towns and villages of Dacorum because</p>

	they want the quality of life and access to the countryside these provide. Many of the proposed developments in the local plan exhibition would turn them into a series of suburban sprawls.
Include files	
Number	Question 9
ID	LPIO516
Full Name	Mr John Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No development should be allowed on green belt land under any circumstances (there are no exceptional circumstances listed except making profit for the builders which doesn't count). We should only build on unprotected land and on brownfield sites. Builders should be forced to use all their land reserves first before choosing the nuclear option of green belt development.
Include files	
Number	Question 9
ID	LPIO522
Full Name	Debbi James-Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt should not be built on, It protects our boundary. Apparently, it may be built on in exceptional circumstances. These are NOT exceptional circumstances and no one has demonstrated what these exceptional circumstances are that warrants this. I also want to know what is being done to develop brown field sites and supporting regeneration. None of these developments are doing this. Similarly, empty housing and office buildings should be the first port of call.
Include files	
Number	Question 9
ID	LPIO539
Full Name	Mrs Sarah West
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 9
ID	LPIO565
Full Name	Mrs Caroline Williams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green belt should be sacrosanct. It is the Governments and your duty to protect that. The South East in general is already so crammed full of people and cars, that the impact on wellbeing can be seen in the increase in mental health, the pressure on our infrastructure, schools, health services and actually the stagnant GDP.
Include files	
Number	Question 9
ID	LPIO582
Full Name	Georgina Tregoning
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I believe that the Council should continue to view the village boundaries in the 2004 Local Plan as definite boundaries, to limit the effects of sprawl.
Include files	
Number	Question 9
ID	LPIO618
Full Name	Mrs Carole Stokes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Nothing about this development is exceptional enough to build on our green belt or rural areas. Leave them alone and develop brown field sites. If there aren't enough of them, maybe the South East cannot take anymore development? Leave our remaining green spaces alone.
Include files	
Number	Question 9
ID	LPIO646
Full Name	Mr Ed Whetham
Company / Organisation	Laxton Properties
Position	Director
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>With regards paras 5.2.10 and 5.2.11, we agree that there should not be significant development extending the small villages into the open countryside. However, new housing can bring benefits and help maintain existing village services and we believe that appropriate smaller scale development should be encouraged. On occasion this may be more than 'limited infilling' and we propose that the new Local Plan applies fewer restrictions to development within settlement boundaries than is currently the case.</p> <p>For example, for those villages such as Chipperfield that are washed over by the Green Belt we suggest that there be a presumption generally in favour of development that takes place within the settlement boundary, rather than limiting any development to 1 or 2 units, as long as those developments are appropriate to their context and surroundings. There are various examples of sites where such development could deliver up to say 10-15 homes (of a mixture of sizes and tenures, including affordable housing) without extending the footprint of the village.</p> <p>By encouraging this sort of development within the heart of villages, there will be a stronger argument to resist inappropriate sprawl beyond the settlement boundary, whilst helping to support the viability of existing services and the vitality of the villages, increasing the potential for those who have grown up in such villages to be able to remain living there. Were such a measure applied to all of the small villages, both within and outside of the Green Belt, this would be likely to provide a good number of homes to contribute towards Dacorum's total requirement, which because of the small nature of the sites would have a minimal negative impact on the surrounding areas and would be deliverable in the short term, in contrast to the delayed delivery that is to be expected from some of the larger sites.</p>
Include files	

Number	Question 9
ID	LPIO661
Full Name	Mr David Smith
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 we should enable well planned and structured development in certain green belt areas.</p> <p>Without growth into certain green belt there will not be enough space for housing expansion required. The objective of green belt as defined in the 1930's was to prevent urban sprawl. Clearly we do not want to have a free for all on development, but we should not delude ourselves that significant expansion required to house our children's generation will be achieved within the current designated areas. We need to have family homes with gardens, not more cramped town centre apartments.</p> <p>As an example, sensible development of the Tr- H1 (perhaps 200- 300 homes) along Tring Station Road would help connect Tring to the station, a logical use of green belt for housing development.</p>
Include files	
Number	Question 9
ID	LPIO703
Full Name	Fiona Silver
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There are no 'exceptional circumstances' here that justify the building on green belt land.
Include files	
Number	Question 9
ID	LPIO711
Full Name	Mr Julian Dent
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 do not agree with Green Belt being built on in any circumstances. It is there for a very good reason, as you acknowledge in your own remarks.</p> <p>I'd also like to refer specifically to the proposals for the sites around Piccotts End, HH-h1a/b and HH-h2. You explain above:</p> <p>'We commissioned a Green Belt Review (Stage 1, November 2013) which considers all the Green Belt in Dacorum. This is supported by a further Green Belt Review and Landscape Appraisal (Stage 2, January 2016) which considers the Green Belt adjoining our main settlements. The studies break the Green Belt into parcels and assess these against nationally set criteria. The Stage 2 study also considers the wider issue of landscape setting.</p> <p>5.2.4 The studies conclude that most of our Green Belt meets the Government's criteria for designation. There are however a few areas which don't meet all of the criteria and so could have their Green Belt designation removed. This could allow planned development to then take place.'</p> <p>I refer you to the schedule of site appraisals which clearly states that the Stage 2 Green Belt Review recommended that HH-h1a, HH-h1b and HH-h2 should ALL be excluded from further settlement and retained as Green Belt.</p> <p>It seems quite plain to me that none of these sites should be considered further as suitable for development in any way.</p>
Include files	
Number	Question 9
ID	LP10716
Full Name	Mr Miguel Patel
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In respect of the proposed development of Wayside Farm Greenfield site (denoted as KL-h3 in the site appraisal document, DBC is ignoring the findings of its own <i>Stage 2 Green Belt Review and Landscape Appraisal</i>, which presents the following assessment:</p> <p><i>Particularly as a result of local topography, this sub-area plays an important role in maintaining separation between Kings Langley and Abbots Langley. Its release would further reduce this gap in both physical and perceptual terms and would compromise the integrity of the overall gap, thus impacting upon the ability of the wider Green Belt to meet this purpose. While there are some urbanising influences at the fringes, particularly in the north, the sub-area retains a largely rural and open</i></p>

	<p><i>character with a strong relationship with the countryside. Overall, the release of much of the sub-area would represent severe encroachment on a valuable area of countryside.</i></p> <p>The report concludes:</p> <p><i>(The) sub-area would compromise the ability of the wider Green Belt to meet its purposes. Exclude from further consideration.</i></p> <p>In the scenario that 'exceptional circumstances' are deemed applicable and, as such, development on the greenbelt is permitted, the above findings preclude the consideration of the proposed development of this site.</p> <p>Furthermore, the consultation document does not offer compelling evidence that the criteria Government's Housing White Paper on making changes to greenbelt boundaries have been fully considered.</p> <ul style="list-style-type: none"> <i>making best use of brownfield sites and supporting their regeneration;</i> <p>To my knowledge, the full extent of brownfield site development is yet to be explored.</p> <ul style="list-style-type: none"> <i>making best use of land which is currently underused, including land owned by the public sector;</i> <p>Wayside Farm is an extensively used site, both in terms of its status as a viable, profitable business and as an important area for biodiversity and recreation.</p>
Include files	
Number	Question 9
ID	LPIO718
Full Name	Mr Miguel Patel
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In respect of the proposed development of Wayside Farm Greenfield site (denoted as KL-h3 in the site appraisal document, DBC is ignoring the findings of its own <i>Stage 2 Green Belt Review and Landscape Appraisal</i>, which presents the following assessment:</p> <p><i>Particularly as a result of local topography, this sub-area plays an important role in maintaining separation between Kings Langley and Abbots Langley. Its release would further reduce this gap in both physical and perceptual terms and would compromise the integrity of the overall gap, thus impacting upon the ability of the wider Green Belt to meet this purpose. While there are some urbanising influences at the fringes, particularly in the north, the sub-area retains a largely rural and open character with a strong relationship with the countryside. Overall, the release of much of the sub-area would</i></p>

	<p><i>represent severe encroachment on a valuable area of countryside.</i></p> <p>The report concludes:</p> <p><i>(The) sub-area would compromise the ability of the wider Green Belt to meet its purposes. Exclude from further consideration.</i></p> <p>In the scenario that 'exceptional circumstances' are deemed applicable and, as such, development on the greenbelt is permitted, the above findings preclude the consideration of the proposed development of this site.</p> <p>Furthermore, the consultation document does not offer compelling evidence that the criteria Government's Housing White Paper on making changes to greenbelt boundaries have been fully considered.</p> <ul style="list-style-type: none"> <i>making best use of brownfield sites and supporting their regeneration;</i> <p>To my knowledge, the full extent of brownfield site development is yet to be explored.</p> <ul style="list-style-type: none"> <i>making best use of land which is currently underused, including land owned by the public sector;</i> <p>Wayside Farm is an extensively used site, both in terms of its status as a viable, profitable business and as an important area for biodiversity and recreation.</p>
Include files	
Number	Question 9
ID	LPIO728
Full Name	Mr Dave Barnes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt is there for a purpose and therefore should be sacrosanct.
Include files	
Number	Question 9
ID	LPIO745
Full Name	Mrs Victoria Vernon
Company / Organisation	Sport England
Position	Trainee Planer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	Sport England would suggest that Green Belt policies take a positive approach to the principle of changing the use of land to outdoor sport where an identified need exists for new or enhanced community sports facilities. This would help community bodies such as local sports clubs that are seeking to provide new and enhanced facilities to meet local needs identified in the Council's evidence base as current Green Belt policy requires exceptional circumstances to be made to justify change of use to outdoor sport in the Green Belt.
Include files	
Number	Question 9
ID	LPIO768
Full Name	Mr David Palfrey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I believe local planners must show to local residents that all brownfield sites in Dacorum have been excused before Green Belt developments in any village are considered, in Kings Langley for example. Alternatively maybe be the policy on existing housing permissions needs to be loosened to encourage development in existing neighbourhoods to fill potential demand for new/ bigger housing.
Include files	
Number	Question 9
ID	LPIO797
Full Name	Mrs Catherine Marks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt land has been made green belt for a purpose and as you state it is to keep a sense of openness. This is the reason people move to villages. They are also their to protect countryside from development, which is now under threat and once it's gone it's gone. You say the Government states we need to local at the future needs. Villages have no future needs if they are thriving and managing already.

	<p>Three of your proposed sites in Bovingdon are not sustainable with regards to access and infrastructure. The sites South East of Homefield and land rear of Green lane/Louise Walk simply can not take the extra traffic. It is close to the area that gets flooded each year and access is limited into the village on those roads already. It would create chaos.</p> <p>The proposed site at duckhall farm also has very limited access and a main road would need to link to box lane in order for the traffic not to have an adverse affect on the village.</p> <p>A suggestion of development in Bovingdon would be to use the land next to the prison adjacent to Hyde Lane where there are derelict offices. Although this wouldn't add hundreds of homes it is in a developable area with minimum impact. There is also a huge unused car park on the prison site near the entrance that could be developed on.</p> <p>The airfield is the ideal place for development as it is on the main road into Chesham and Hemel Hempstead and it could have it's own amenities.</p>
Include files	
Number	Question 9
ID	LPIO818
Full Name	Mrs Karen Bevan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Current policy protects Green Belt, development should NOT be allowed on this scale, it is not necessary.
Include files	
Number	Question 9
ID	LPIO835
Full Name	Mrs Valerie Lee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	GREEN BELT LAND SHOULD BE SACROSANCT
Include files	
Number	Question 9
ID	LPIO857

Full Name	Mr Stephen Bevan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The current policy on Green Belt land should be honoured, which means development on this land on the scale being considered should be prevented.
Include files	
Number	Question 9
ID	LPIO881
Full Name	Mr Ian Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt should regarded as sacrosanct. The scale indicated in the options is too high and ignores current Government Policy
Include files	
Number	Question 9
ID	LPIO921
Full Name	Ms Stephanie Knowles
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 9
ID	LPIO954
Full Name	Mr Robin Knowles
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The green belt should be protected to maintain that feeling of openness that it provides and the sense that we leave somewhere nice and not homogenised by a town like Hemel Hempstead.
Include files	
Number	Question 9
ID	LPIO1001
Full Name	Mr Dominic Lawrance
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Obviously I agree about making best use of brownfield sites and making best use of land which is currently underused. It is also obvious that the Council should explore whether other local authorities may be able to meet housing needs which would otherwise be met within this borough.</p> <p>I do NOT agree that the density of new developments should necessarily be maximised. There are cases where new housing should be built at relatively high density so as to maximise, within reason, the number of individuals who can be accommodated per hectare. However, there are also cases where if development is to be permitted at all, it must be low density, with low visual impact, to avoid undue harm to the rural character of the site and views from surrounding countryside. For obvious reasons developers always want to build relatively high density estates with houses constructed cheek by jowl and minimal green space around them, but that is not an acceptable approach for Green Belt land where the visual impact on surrounding countryside must be considered.</p>
Include files	
Number	Question 9
ID	LPIO1021
Full Name	mr Tish Seabourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	1 • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence

	<p>to DBC for Stage 2 and within the full response to the Stage 1 Green Belt Review</p> <p>https://www.miltoneraburys.com/dbc-adjacent-green-belt-review/</p> <p>Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence, this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.</p> <p>Budget may alter the Government position but policy now is to protect Green Belt. The DBC consultants have ignored this principle. Such large scale development on Green Belt is unnecessary.</p>
Include files	
Number	Question 9
ID	LPIO1073
Full Name	Ms Tish Seabourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green Belt should be protected at all costs. The Green Belt Review was flawed as highlighted in the link below</p> <p>https://www.miltoneraburys.com/dbc-adjacent-green-belt-review/</p>
Include files	
Number	Question 9
ID	LPIO1080
Full Name	Mr Dominic Gibberd
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It's called the Green Belt for a reason! Once you allow construction on this land there will be no way of limiting the continued sprawl of London and the urban satellite towns. Increase densities whilst promoting intelligent, sympathetic design. Try to avoid this area becoming a clone of all large scale developments we see popping up all over the country.
Include files	
Number	Question 9
ID	LPIO1089
Full Name	Mrs Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	You have not shown how some of the current green belt does not meet the criteria - as described in clause 5.2.4. You have also not provided any exceptional circumstances which may warrant building on green belt land.
Include files	
Number	Question 9
ID	LPIO1143
Full Name	Mrs Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Even the Government still believes in the green belt though there are noises otherwise. Limited development, done sensitively to the environment, surroundings and infrastructure are inevitable but not total disregard for the ambience the green belt provides - and its health benefits.
Include files	
Number	Question 9
ID	LPIO1175

Full Name	Mr John Ingleby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Too many aspects of Dacorum's Green Belt policies are ill-defined and remain to “be considered as part of the Plan Review”.
Include files	
Number	Question 9
ID	LPIO1188
Full Name	Miss Kylie Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In respect of the proposed development of Wayside Farm Greenfield site (denoted as KL-h3 in the site appraisal document, DBC is ignoring the findings of its own <i>Stage 2 Green Belt Review and Landscape Appraisal</i>, which presents the following assessment:</p> <p><i>Particularly as a result of local topography, this sub-area plays an important role in maintaining separation between Kings Langley and Abbots Langley. Its release would further reduce this gap in both physical and perceptual terms and would compromise the integrity of the overall gap, thus impacting upon the ability of the wider Green Belt to meet this purpose. While there are some urbanising influences at the fringes, particularly in the north, the sub-area retains a largely rural and open character with a strong relationship with the countryside. Overall, the release of much of the sub-area would represent severe encroachment on a valuable area of countryside.</i></p> <p>The report concludes:</p> <p><i>(The) sub-area would compromise the ability of the wider Green Belt to meet its purposes. Exclude from further consideration.</i></p> <p>In the scenario that ‘exceptional circumstances’ are deemed applicable and, as such, development on the greenbelt is permitted, the above findings preclude the consideration of the proposed development of this site.</p> <p>Furthermore, the consultation document does not offer compelling evidence that the criteria Government’s Housing White Paper on making changes to greenbelt boundaries have been fully considered.</p>

	<ul style="list-style-type: none"> <i>making best use of brownfield sites and supporting their regeneration;</i> <p>To my knowledge, the full extent of brownfield site development is yet to be explored.</p> <ul style="list-style-type: none"> <i>making best use of land which is currently underused, including land owned by the public sector;</i> <p>Wayside Farm is an extensively used site, both in terms of its status as a viable, profitable business and as an important area for the community, biodiversity and recreation.</p>
Include files	
Number	Question 9
ID	LPIO1201
Full Name	Mr Bernard Richardson
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 principle has not changed. There should be no development on Green Belt land unless there are exceptional circumstances and there are none. All possible land on Brownfield sites must be used first i.e. Bovingdon Airfield, parts of the old Bovingdon Brickworks, under utilised Garage blocks etc.</p> <p>Until now, the Borough Council has strongly defended the Green Belt in its planning process. If it fails to protect the Green Belt then it sets a precedent for every future demand on the precious land around Bovingdon.</p>
Include files	
Number	Question 9
ID	LPIO1250
Full Name	Mrs Deborah Pollard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green belt is sacrosanct and once developed cant be reclaimed. Brownfield site development needs further exploration instead.</p>
Include files	
Number	Question 9
ID	LPIO1260

Full Name	Sarah Harper
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There are no exceptional circumstances that justify development on Green Belt land. It needs more protection not more houses building on it.
Include files	
Number	Question 9
ID	LPIO1299
Full Name	Mrs Angela Goddard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Bell Lane and Darrs Lane are single track country lanes, with soft verges and no scope for widening unless you demolish houses lower down to make a proper road. The number of cars already piling onto Shootersway and Durrants Road will cause more congestion, with everyone trying to get to work each day.</p> <p>Presence of sink holes must be a serious safety concern.</p> <p>Currently there is no mains gas or sewage on Shootersway and no foreseeable plans from Herts C C.</p> <p>The water pressure is poor and fluctuating for the existing residents already.</p> <p>If houses built on the Darrs Lane field were to be purely social housing, there might be some argument for them, but we know the developers own that field, and will be building high end housing for the already rich.</p>
Include files	
Number	Question 9
ID	LPIO1310
Full Name	Mrs Alison Cadge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	The green belt prevents urban sprawl, protects countryside uses (including farms and the green open space that gives our villages their character) and prevents urban areas from merging into one another. I would be opposed to development on areas of green belt around the peripheries of Kings Langley.
Include files	
Number	Question 9
ID	LPIO1320
Full Name	Ms judith Perera
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There is absolutely no convincing case made here for taking any greenbelt land for development. Only the developers themselves will benefit from this to the detriment of the existing towns and villages, where infrastructure and facilities are already overstretched.
Include files	
Number	Question 9
ID	LPIO1327
Full Name	Mrs Karen Barnes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Existing village boundaries as per the Local Plan 2004 should be retained. The Green Belt is necessary as part of a balanced environment, enabling people to access the countryside and grow food and is needed to keep our villages and towns separate and to retain their character; I do not support the use of 'exceptional circumstances' in removing the Green Belt designation or developing the Green Belt - this terminology is open to interpretation and any new development in such circumstances can set a precedent. Brownfield sites should be used for development, not greenfield.
Include files	
Number	Question 9
ID	LPIO1354
Full Name	Mr Andrew Calderwood

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. The approach to Green Belt is predicated on DBC searching for and being able to find “exceptional circumstances” so as to enable Green Belt to be used to meet demand for housing. That approach directly contradicts Central Government guidance (June 2016) that:</p> <p><i>The [NPPF] makes it clear that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process <u>and with the support of local people</u>. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.</i></p>
Include files	
Number	Question 9
ID	LPIO1396
Full Name	Mrs Louise Clarke
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 document states that Kings Langley has capacity for a further 50 homes whereas the proposals are looking at an addition of thousands of homes. This surely gives you your own answer. The proposal is not suitable and not acceptable.</p>
Include files	
Number	Question 9
ID	LPIO1416
Full Name	Ms G Puddiphatt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green belt land Must be left alone and all other options explored.</p>

	<p>The plan does not show that the borough has worked hard enough to demonstrate exploration of all other options.</p> <p>As far as I see it, the proposed Plan has taken the easy route.</p>
Include files	
Number	Question 9
ID	LPIO1433
Full Name	Mr Brian Rook
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 Green belt review report (Nov 13) has been misrepresented in the Local Plan. Local Plan section 5.2.4 implies that the proposed new housing areas are likely to be part of "a few areas which don't meet all of the criteria and so could have their Green belt designation removed". This is incorrect - in particular none of the proposed sites in Tring are considered by the Green Belt review report (section 8.2) as being a "sub-area contributing least to Green belt purposes"</p> <p>The Dacorum planning process appears to be putting insufficient effort into identifying suitable Brownfield sites. Local Plan sections 5.4.9 - 5.4.11 identify 1 or 2 sites, but completely ignores sites at, for example, Bovingdon Airfield and Long Marston Airfield. The planning process is being strongly influenced by "developers and landowners . . . let us have details of sites they felt were suitable . . ." (section 6.2.3) . The planning process should be solely run by proper independent public authority planners with no undue influence from vested interests and commercial developers.</p>
Include files	
Number	Question 9
ID	LPIO1446
Full Name	Miss Penelope Allsop
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	we need to protect our farms and greenbelt.... leave it alone
Include files	

Number	Question 9
ID	LPIO1455
Full Name	MR Ian Shaw
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In relation to the Berkhamsted area, the high quality landscape is visible and much enjoyed by residents all over the town as a result of the elevated slopes of most of the adjacent Greenbelt area. The setting of the town is now a significant factor in its business success, particularly its restaurants and leisure related activities.</p> <p>While appreciating the need for new affordable housing, the losses to the landscape would hardly be balanced by the benefits of addressing housing need. Recent experience has shown that affordable housing built in this part of the borough, is quickly driven by market forces to price levels beyond the reach of those in most need. Much greater success is likely to be achieved by the type of development at Apsley Lock which posed no threat to the landscape</p>
Include files	
Number	Question 9
ID	LPIO1486
Full Name	Ms Pam Ferguson
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 9
ID	LPIO1493
Full Name	Mr Chris Marks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	"A key purpose of Green Belt is to keep a sense of openness between built up areas" by building on greenbelt land you take away the very openness you state you are trying to keep. People live in villages and rural towns for this very reason. Not for it to be taken away.
Include files	
Number	Question 9
ID	LPIO1530
Full Name	Mrs Rachel Conradi
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 approach seems to be - "where have land owners offered land", rather than "where do we need the housing". If we approach this from the need for housing then that would give us different sites to consider.</p> <p>For example, although officially green belt, Bovingdon Airfield, would surely be a better place to put houses, to minimise environmental impact than agricultural land. In addition there is a road from this land to the A41. Has anyone approached the landowners here to see if they would sell rather than assuming that they will not?</p>
Include files	
Number	Question 9
ID	LPIO1562
Full Name	MR PETER SUMMERFIELD
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>How have the 4 sites allocated in Bovingdon all gone, overnight, from being greenbelt to greenfield sites? There has been no explanation as to the "exceptional circumstances" that have allowed this to happen. In previous years Inspectors' Reports made on these sites for prospective development have said they are greenbelt land and therefore no development should take place.</p> <p>The owner of the field targeted for development (site bov-h2) has already appeared to have 'cleared' the site of all previous activity (eg horse grazing). This would make the land look as though it is underused (one of the considerations to allow change from greenbelt as laid</p>

	<p>out in your document). I would suspect that the developer is already making progress!</p> <p>Brownfield sites: it appears that DBC have only recently started to ask owners of brownfield sites to submit property.</p>
Include files	
Number	Question 9
ID	LPIO1572
Full Name	Linda Hattersley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The sense of openness between built up areas is essential to give people a clear sense of belonging to their town/village and of where the countryside/rural surroundings start. Green Belt is precious and we need to think ahead for future generations.
Include files	
Number	Question 9
ID	LPIO1602
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	The Green Belt Review is flawed. The Major Developed Sites should be tightly drawn and removed altogether from the Green Belt, creating a new, defensible boundary.
Include files	
Number	Question 9
ID	LPIO1662
Full Name	Mr Peter Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Where are the exceptional circumstances? Berkhamsted is already meeting its housing targets. The only people who will benefit from building on green belt are developers who have no interest in providing the real needs which are social and affordable housing. On every development in Berkhamsted they have used Section 106 legislation to avoid there social responsibilities.
Include files	
Number	Question 9
ID	LPIO1732
Full Name	Mr Kenneth Watts
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	DBC have presented no 'exceptional circumstances' that would warrant ANY dilution of Green Belt status around the larger villages. Low density, high-cost housing for London commuters does not count as exceptional, neither does developer's profits. In 5.1.11 the document refers to 'more detailed policies which control what people can do to existing buildings and land within the Green Belt.' I would suggest that limiting the size of someone's conservatory on the back of an existing property should appear a long way down the list of DBC's priorities when compared with new major encroachments on virgin Green Belt land peripheral to the large villages. Brown field land must always be the priority along with existing buildings that could be converted or demolished and re-developed. I repeat, there are NO exceptional circumstances and there must not be any backsliding or 're-interpretation' of rules. That way will see the 'one bite at a time' loss of the precious and limited resource we all share and treasure - the countryside that separates our communities and provides the natural resource we currently enjoy and that makes Dacorum as whole a good place to be.
Include files	
Number	Question 9
ID	LPIO1762
Full Name	Mr Craig Wiggill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	We have an existing plan for greenbelt protection which this new plan now considers as wrong - this is an aberration. The plan should work within the confines of the existing protections on green belt zones.
Include files	
Number	Question 9
ID	LPIO1781
Full Name	Mrs Pamela Kingsland
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I absolutely do not agree with the above in any shape or form. What will our children and grandchildren have to look forward, no fields to roam just concreted over productive farmland.
Include files	
Number	Question 9
ID	LPIO1819
Full Name	Mr Richard Case
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"> • Underplays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting – perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.southampton.gov.uk/media/2472/Stage1GreenBeltReviewResponse.pdf • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations

	<ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been – assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO1855
Full Name	Ms Julia McAdam
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The local infrastructure is not suitable for expansion.
Include files	
Number	Question 9
ID	LPIO1876
Full Name	Mrs Alison Hales
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	You need to explore all other options. Using green belt land only benefits the developer. The local community will then pay the price for ever with the loss of countryside/wildlife and increased pressure on local resources and roads.
Include files	
Number	Question 9

ID	LPIO1916
Full Name	Miss teresa finnigan
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, you need to preserve the GB and create new rural villages or towns, whereby you put new infrastructure in place.</p> <p>The government needs to look to new towns further north, set up/relocate businesses, use the LEP governments initiative to make this happen.</p>
Include files	

Number	Question 9
ID	LPIO1920
Full Name	ms V Earle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The green belt should not be used for development. It is there to protect the environment. there is no such thing as sustainable development in the green belt. if planned planning is allowed it will eventually all be gone. We should focus on good quality high density housing in areas where there is good infrastructure.
Include files	
Number	Question 9
ID	LPIO2014
Full Name	Mrs Christine Mabley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I cannot see any mechanism for how to deal with development in the green belt that sets a limit on what is appropriate and ensures policies are applied in a consistent and fair way. National policy may not be specific enough. Terms such as disproportionate and materially larger are relative and not particularly useful.
Include files	
Number	Question 9
ID	LPIO2028
Full Name	Mr Christopher Giddings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The proposed development of Kings Langley (including Shendish) and Hemel will effectively make Kings Langley a suburb of Hemel. The purpose of the green belt is to keep the open nature of the space between towns.

	The councils approach appears to only consider the view from the road between these towns. Driving from Kings Langley to Hemel does not reflect how green the space is between these towns as there are houses aside the road but green fields behind which cannot be seen from the road.
Include files	
Number	Question 9
ID	LPIO2117
Full Name	Mrs Caroline Jarrett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Developing the Be-h3 (Ivy Hous Lane) site constitutes a severe violation of Green Belt land. The case for development of this land is far short of the "special circumstances" which are required.</p> <p>Furthermore, this development would have a negative effect on the immediately adjacent AONB. As such, there is a strong case for adding this site into the AONB.</p>
Include files	
Number	Question 9
ID	LPIO2147
Full Name	Mr Simon Ware
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 House of Commons Briefing Paper on Green Belt Nov 2017 has not be fully incorporated into the Local Plan.</p> <ul style="list-style-type: none"> Local Authorities need to take into account constraints such as Greenbelt within their strategic housing land availability assessments. This may restrict the number of developments and restrain the ability of the local authority to meet its identified housing needs. Dec 2014. Planning Minister Brandon Lewis stated that the Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement for Local Plans

	<ul style="list-style-type: none"> Any destruction of the Green belt for development may require a Court decision <p>Dacorum are therefore not obliged to meet their designated housing targets if it will require the destruction of the Greenbelt under the Nov 2017 Green Belt Briefing Paper.</p> <p>However, The Housing White Paper Feb 2017 seems to contradict this view but requires that the impact of the destruction of the Greenbelt needs to be offset by improvements to environmental quality or access of existing Greenbelt. A commitment therefore needs to be made within the revised Local Plan that the adverse impact caused by development on Greenbelt is offset by improvements elsewhere.</p>
Include files	
Number	Question 9
ID	LPIO2159
Full Name	Mr Les Mosco
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Dacorum has a high proportion of Green Belt and AONB. These are assets that are a fundamental part of the character of the area. They should be preserved wherever conceivably possible.</p> <p>AONB should be sacrosanct, with no development except very small parcels, eg conversion of existing buildings for housing with associated very limited 'barn yard' type conversions. These can provide high quality (but expensive) housing, which if limited to only small areas would not detract from local amenities. But zero medium and large scale development in AONB should be allowed.</p> <p>Similarly Green Belt development should be limited and strictly controlled. The Arup study identified some possible Green Belt sites for development. A first principle is that Dacorum must resist any sites which that study has not already identified as potential for development. But in addition, there must be consideration of the cumulative effect from allowing several of the 'Arup' sites to be developed. A single site might be deemed OK, but it may not be if a nearby site is also developed. The cumulative effect on roads, schools, social amenities, water supplies, etc etc , must all be considered with clear resolutions - not vague ideas - before development plans are approved. The cumulative impact of development past, present and proposed must be assessed.</p>

Include files	
Number	Question 9
ID	LPIO2206
Full Name	Mrs Melanie Flowers
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It appears that the proposed greenbelt development sites around Kings Langley (Wayside Farm, Rectory Farm, Hill Farm & Shendish) have only been suggested as they have been offered by landowners rather than a considered approach towards where housing is actually required and where it can be provided in a sustainable manner for infrastructure and environmental considerations. None of the greenbelt should be allowed to be developed in these locations.
Include files	
Number	Question 9
ID	LPIO2238
Full Name	Mr Jason Smith
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 wrong to consider building on Green Belt sites. These define the village boundaries and to build on them eradicates the village as a "village" and we become an extension to the London suburbs
Include files	
Number	Question 9
ID	LPIO2241
Full Name	Mr Peter Flowers
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Limited development, done sensitively to the environment, surroundings and infrastructure are

	inevitable but not total disregard for the ambience the green belt provides - and its health benefits. The 'proposals' being put forward show a disregard for the concept of Green Belt and the villages it tries to protect
Include files	
Number	Question 9
ID	LPIO2254
Full Name	Mr Robert Wakely
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	See Q2 response
Include files	
Number	Question 9
ID	LPIO2274
Full Name	Mrs Karen Evans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Dacorum Borough Council seems to have very little regard for its green belt. If they were really committed to utilising Brown Field sites for housing, they would have ensured that the site previously occupied by the ford dealership was replaced by homes not more retail development
Include files	
Number	Question 9
ID	LPIO2286
Full Name	mr David van Rhee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	building on the green belt would ruin the character of Tring and the surrounding villages. There is a danger of Tring outgrowing its ability to support itself.
Include files	
Number	Question 9
ID	LPIO2312
Full Name	Mr George Bull
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 overwhelming area of the sites put forward around Tring are Green Belt. To limit the consultation to Green Belt sites put forward by developers is to breach the conditions laid down by the Housing White Paper which are summarised at 5.2.7.</p> <p>Time and again in this consultation, the principles and conditions are clear, broadly fair and frequently supportable. However, the actual details of the specific sites which are the subject of the consultation around Tring consistently breach those conditions. This brings the consultation process into disrepute and raises questions of bad faith and maladministration.</p>
Include files	
Number	Question 9
ID	LPIO2368
Full Name	Dr Nick Hodsdon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>There should be NO development on GREEN BELT land</p> <p>Development must not lead to the coalescence of villages or loss of their character and identity.</p> <p>Why does the plan not consider setting up additional conservation areas such as Rucklers Lane where there the character of the lane needs to be preserved and there is a historic interest?</p> <p>There should be further restrictions on development by home owners</p> <p>Infilling should not be permitted where it leads to coalescence</p>
Include files	

Number	Question 9
ID	LPIO2395
Full Name	Mr Paul Crosland
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt Reviews undertaken by consultants employed by Dacorum/ St. Albans/ Welwyn-Hatfield have been 'confirmation biased' i.e. they have identified sites/ areas to be removed from the Green Belt and have then found ways of demonstrating how those site/ areas have little or no value as Green belt land. Green Belt land which fulfils the fundamental role of preventing urban sprawl/ agglomeration should be protected. Consideration should always be given to the effect of development on the character and nature of the surrounding area, towns/ villages.
Include files	
Number	Question 9
ID	LPIO2459
Full Name	Mr Timothy Copeman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There should be no review of existing green belt and the boundaries have to be maintained as they currently exist. One a change has been made it will be too late to prevent further designation and building on existing Green land
Include files	
Number	Question 9
ID	LPIO2515
Full Name	Mr Jack Costin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Green Belt grab around Tring is far too great and if worst case were adopted would create an ugly urban sprawl between Aston Clinton and Aldbury through a narrow High Street that cannot cope with the consequent increase in traffic flow.
Include files	
Number	Question 9
ID	LPIO2546
Full Name	Mr Kevin Kelly
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I totally agree with the proposed approach but does the council as the proposed development of the green belt areas around our villages will greatly reduce the sense of openness between and built up areas and lead to the coalescence of our villages and towns.
Include files	
Number	Question 9
ID	LPIO2578
Full Name	Mrs Marriott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt should not be considered without fully assessing the brown field land in the borough first. Currently there is no brownfield register and council is driven by developers who own land in the green belt who want them taken out of green belt boundary. This will not set a good precedence!
Include files	
Number	Question 9
ID	LPIO2601
Full Name	Mr John Morrish
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	There is a reason for green belt and it should not be eroded by spurious 'exceptional' reasons. Surely the best solution would be to develop a small new town on Bovingdon Airfield which could be linked directly to the A 41 to minimise impact on local roads and the village. That way we can keep the best of our green belt such as all around Kings Langley for the benefit of everyone and not sacrifice it when there are better brownfield/lower grade land options
Include files	
Number	Question 9
ID	LPIO2608
Full Name	Lisa Savage
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 approach to Green Belt is predicated on DBC searching for and being able to find “exceptional circumstances” so as to enable Green Belt to be used to meet demand for housing. That approach directly contradicts Central Government guidance (June 2016) that:</p> <p>The [NPPF] makes it clear that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people.</p> <p>The turnout of 800 people at the extraordinary Parish Council meeting make it abundantly clear that the local people do not support the green belt development.</p> <p>In section 5.2.6 you state that you should consider whether these areas would 'provide the necessary infrastructure needed to support the development' - in the case of the Shendish proposal the answer is glaringly obvious - No. the infrastructure would not support 900 home and a school. It is already a challenge to navigate the lower part of Rucklers Lane as residents need to park on both sides of the street - so it would be utterly ludicrous to consider that as an access route. The A4251 fares little better and is regularly excessively congested.</p>
Include files	
Number	Question 9
ID	LPIO2615
Full Name	Mr Gregory Gregory Hukins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Developing green belt and rural areas on the edge of developed areas just creates urban sprawl and eventually there are no natural boundaries between the villages and towns in Dacorum.
Include files	
Number	Question 9
ID	LPIO2617
Full Name	Mrs Elisabeth Young
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There should be NO building on Green Belt or rural land. This should be for enjoyment of the local community.
Include files	
Number	Question 9
ID	LPIO2645
Full Name	Mr Alan Andrews
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt is greenbelt. It should be protected at all costs. We will be part of London soon.
Include files	
Number	Question 9
ID	LPIO2728
Full Name	Mr James Puddiphatt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No. Green belt must be left alone at all costs.
Include files	
Number	Question 9
ID	LPIO2749

Full Name	Mr James Puddiphatt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I don't agree. There should be no development on green belt land.
Include files	
Number	Question 9
ID	LPIO2758
Full Name	Mr Cyril Mills
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There is a lack on consistency and it seems that brownfield sites have not been prioritised. The interests that this serves would seem to be that of landowners and developers
Include files	
Number	Question 9
ID	LPIO2786
Full Name	mrs Gillian Hooper
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A key purpose of Green Belt is to keep a sense of openness between built up areas. By building on greenbelt land you take away the very openness you state in your vision that you are trying to keep. People live in villages and rural towns for this very reason. Not for it to be taken away.
Include files	
Number	Question 9
ID	LPIO2787
Full Name	mrs Gillian Hooper
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 9
ID	LP102803
Full Name	Mrs Carol Chandler
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 feel I must state my opposition to the proposed building of up to 3,580 houses in this village. This will more than double the population and erode the definition of it being a village – more an outpost of Watford or Hemel Hempstead. Much of what keep Kings Langley alive and thriving is its community spirit. How can this be maintained when its heart and soul are proposed to be threatened.</p> <p>I am not opposed to the building of new home – we need to progress – but I think the infrastructure has not been considered. Recent developments (like the Ovaltine and Apsley Lock) have added 1000's more cars on the roads and passengers on the railways and they are all at breaking point.</p> <p>Cars – the potential development could add more than 3,500 cars to the village and surrounding areas. The A4251 is already gridlocked in the mornings and evenings with people trying to get out or return to the village making their journeys impossible and very slow. Not good for the environment or for those travelling. How the addition of those extra cars/delivery vehicles etc. etc. can be accommodated I don't know and hasn't been considered. In addition, recent developments have been approved without sufficient parking spaces (look at Red Lion Road which is parked on both sides) so parking needs to be considered. There isn't enough parking in the village itself or even in Hemel or Watford so how will these urban centres accommodate so much extra traffic?</p> <p>With traffic at a standstill or crawling at the moment, the addition of so many extra cars would mean access for emergency vehicles would be impossible.</p> <p>Railways - As a commuter from Kings Langley to London for the last 30 years, I have seen the numbers of passengers grow year on year. I frequently don't get a seat in a morning and often can't get in the Car Park at Kings Langley station (even with the increased capacity that was added a few years ago). Having consulted with</p>

London Midland they assure me there is no more capacity on the line to add extra trains so cant alleviate the crush by adding to the frequency. The platforms also got lengthened a few years ago to accommodate longer trains so that is also at full capacity. The addition of additional houses will only make this worse.

Schools - I note there is a junior school proposed in the Rucklers Lane development, but no additional secondary school places. 3,580 homes might reasonably be expected to contain 3,500 children, with approximately one third of these being of secondary school age. That's 1,200 extra secondary school places. Rudolf Steiner School in Kings Langley is also under threat (although I hope this doesn't happen) but that could mean an additional 500 places. How exactly does the plan deal with the additional 1,700 secondary school places?

Doctors - The existing medical facilities (2 great Surgeries in the village) have grown over the years but physically don't look to be able to expand and certainly wont be able to cope with doubling the population – how will this be catered for? The proposed addition of retirement homes will increase the likelihood of additional medical support for the elderly – how will this be provided?

Green Belt Sites – All 4 proposed sites in Kings Langley are Green belt. As I said, I am not opposed to development but the village can not cope with anything of this size. I especially want to mention Wayside Farm. This is one of only 2 working dairy farms in the county of Hertfordshire, and, as such, is a precious resource. The farm is not only a great working asset to the village but also a community hub for children and adults alike. We should be supporting working farms and the production of milk and food not proposing their closure. Many people love the village and its rural setting to access the field and countryside. The addition of so many cars and loosing green belt land will do untold damage to the environment – once its gone, its gone.

Therefore, to sum up, I am opposed to the proposed doubling of the size of Kings Langley and the use of green belt land. Please look at developing the brown field sites in proposal 1A.

Include files	
Number	Question 9
ID	LPIO2846
Full Name	Mr Paul Mcpherson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	People live here because it's a village and rural. The changes would effect all of quality of life in a negative

	way. The village does not have infrastructure to support more housing
Include files	
Number	Question 9
ID	LPIO2863
Full Name	Mr Antony Harbidge
Company / Organisation	Berkhamsted Residents Action Group (BRAG)
Position	Chairman
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"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.southoxfordshire.gov.uk/2013/07/24/brag-response-to-stage-1-green-belt-review/ • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. • The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."

Include files	BRAG Analysis of the GReen Belt Review undertaken for DBC by SKM final version (1)
Number	Question 9
ID	LPIO2910
Full Name	Dr Rachael Frost
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The green belt should be protected as a priority, with minimal building and only where it is necessary housing. Having so much green belt space is one of the main attractive parts of Dacorum. Developments should focus on smaller, higher density accommodation that can suit 1-2 people (e.g. non high rise flats) rather than large sprawling family homes, which are likely to be what is chosen by developers. Having movable village boundaries will mean that they slowly encroach into each other. Reading the working note, many of the building sites proposed are unlikely to be redesignated anyway.
Include files	
Number	Question 9
ID	LPIO2937
Full Name	Mr John Lunn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt Review is flawed. Use of brown field sites should be preferred. The green belt should be used as a tightly controlled area separating towns and villages, rather than simply allowing everything to "merge". This was it's original purpose to restrict urban sprawl as seen in and around London and other cities.
Include files	
Number	Question 9
ID	LPIO2951
Full Name	Mrs Kate Harwood
Company / Organisation	Hertfordshire Gardens Trust
Position	Conservation Officer
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Hertfordshire Gardens Trust believe that the value of Green Belt land in acting as the setting for heritage assets has not been accorded due weight. The historic parks and gardens on the edge of settlements, as at Shendish (Kings Langley) and round Tring derive some of their significance from the Green Belt setting and this should be protected from harm, as detailed in NPPF 126 where 'sustaining and enhancing significance of heritage assets' is the first point. The Green Belt itself is derived from the principles of Garden Cities laid down by Ebenezer Howard with the insistence on combining the best of countryside and town without urban sprawl. Hemel is one of the New Town, the successors to Garden Cities, and the same principles were used in its layout of green spaces and housing to give all residents easy access to open green space. These principles should not be compromised by urban creep
Include files	
Number	Question 9
ID	LPIO2953
Full Name	Mr Ivor Eisenstadt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Government concept that Green Belt land will not be built upon so instead they will remove it from the Green Belt and then build on it is perverse and disingenuous. There are other options to addressing our housing shortage than by destroying large tracts of our countryside. Please be strong and be led by the needs and wishes of local people rather than by the pressures of National Government and the housing developers lobby.
Include files	
Number	Question 9
ID	LPIO2954
Full Name	Mr Ivor Eisenstadt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Government concept that Green Belt land will not be built upon so instead they will remove it from the Green Belt and then build on it is perverse and

	disingenuous. There are other options to addressing our housing shortage than by destroying large tracts of our countryside. Please be strong and be led by the needs and wishes of local people rather than by the pressures of National Government and the housing developers lobby.
Include files	
Number	Question 9
ID	LPIO3003
Full Name	Mr Paul Stanbridge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Changes appear to have been recently made to the Green Belt, following the commissioned review. The 'exceptional circumstances' appear to have been driven by a potential developer, Crown Estates, acquiring land, rather than a thorough evaluation of the affected countryside.
Include files	
Number	Question 9
ID	LPIO3026
Full Name	Mr John McCombe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The key purpose of the Green Belt is stated in 5.2.1, and 5.2.6 is an important qualification. Coalescence of villages and towns need to be avoided to the maximum extent possible, and in the (hopefully few) cases where such development has to be approved, please put the infrastructure improvement as priority 1
Include files	
Number	Question 9
ID	LPIO3048
Full Name	Mrs Carolyn Hill
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 proposed approach under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting – perhaps revisit village boundaries. In addition, the Inspector’s report [July 2013] records “it must be remembered that many of these settlements (e.g. Tring/Berkhamsted) are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.</p> <p>Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with existing developed sites regardless of ownership of the land. It all appears to random, flawed and incoherent.</p>
Include files	
Number	Question 9
ID	LPIO3064
Full Name	mr hugh siegle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Government policy is clear that development on Green Belt land should only occur in exceptional circumstances. There is little justification in the studies by your consultants to support such development despite their conclusions. By contrast to the preparation of the Core Strategy it appears that in preparing this Consultation you have been influenced by the representations of developers and these flawed Green Belt studies.</p> <p>If Green Belt development is to take place to meet a housing need (as opposed to the demands of developers) a more radical approach is required. Rather than targeting the easy to develop small parcels of land you should be looking at a large scale extension of Hemel Hempstead, a New Town and sub-regional centre, which would provide a planned mixture of social, affordable and market housing, offering opportunities for rental, first time buyers and elderly with matching infrastructure providing education, community, health, retail and employment opportunities. That might pass the test of "exceptional" and would protect the Green Belt and therefore the towns and villages elsewhere in the Borough from excessive development.</p>
Include files	
Number	Question 9
ID	LPIO3073

Full Name	Mrs Rosie Eisenstadt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There are no exceptional circumstances which warrant Green Belt changes around Berkhamsted. The town has already taken more than its fair share of housing.
Include files	
Number	Question 9
ID	LPIO3111
Full Name	Mr John Whiteman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	This plan entails severe damage to the green belt
Include files	
Number	Question 9
ID	LPIO3130
Full Name	Mrs Suzanne Stretton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	How can it be acceptable to consider building on greenbelt, yet when considering infrastructure such as station parking, it's stated that expansion isn't possible because it's in an area of outstanding natural Beauty. Housing cannot be considered isolation without a strategic plan for infrastructure.
Include files	
Number	Question 9
ID	LPIO3141
Full Name	Mr John Walker
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 9
ID	LPIO3182
Full Name	Dr Jennifer Howes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Berkhamsted has already met and exceeded its housing targets.
Include files	
Number	Question 9
ID	LPIO3193
Full Name	Mrs Alicia Southgate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	This document states that Kings Langley has capacity for a further 50 homes whereas the proposals are looking at an addition of thousands of homes. This surely gives you your own answer. The document also states that green belt is there to help keep a sense of openness between built up areas. By building in these areas, you are essentially causing Kings Langley to merge with Hemel Hempstead/Apsley and Watford.
Include files	
Number	Question 9
ID	LPIO3213
Full Name	Mrs Juanita Mann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt is part of our heritage for future generations. Moving the boundaries as an easy option to meet housing needs should not be considered. This would become the 'thin end of the wedge.' The Green Belt MUST remain to provide a boundary between urban development and to provide areas for people to visit and enjoy.
Include files	
Number	Question 9
ID	LPIO3227
Full Name	Mr George Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	NPPF 79 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. This is supported by case law.
Include files	
Number	Question 9
ID	LPIO3278
Full Name	
Company / Organisation	Premier Property Acquisition
Position	
Agent Name	Mr Jonathan Buckwell
Company / Organisation	DHA Planning
Position	Director
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We agree in particular that this is an appropriate time to consider whether sites which are suitably located for sustainable development meet the relevant Green Belt criteria. The Green Belt Review Stage 2 Landscape Appraisal Report confirms, at section 7.2.1.1 that my client's land at Ivy House Lane, Berkhamsted (zone BK-A7) is categorised as a "less constrained area for further consideration" with the following summary given for this site: "The further refined sub-area does not compromise the ability of the wider Green Belt to meet its purposes, nor is it judged to be highly sensitive to change in landscape terms. While Ivy House Lane would itself be a readily recognisable and permanent Green Belt boundary, it is

	<p>suggested that a denser planted buffer is established to ensure that the site is well screened from the more sensitive countryside to the east. The site has no identified constraints.”</p> <p>The report confirms that removal of this site from the Green Belt would not compromise the ability of the wider Green Belt to meet its current purposes. It recommends that the Green Belt boundary should be considered to be amended in this location.</p>
Include files	
Number	Question 9
ID	LPIO3339
Full Name	Mr Peter Hadden
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>DBC's selection of potential sites on Green Belt land appears to have been largely driven by landowners and developers putting them forward in order to make a profit rather than a wider and more considered exercise of its long term responsibilities to protect the landscape for the enjoyment of future generations.</p> <p>The retained consultants TRL appear to have been briefed to find reasons for de-classification of parcels of Green Belt rather than to approach each assessment from a truly neutral perspective.</p> <p>Lastly, it seems to have been forgotten that NPPF guidance is that: "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".</p>
Include files	
Number	Question 9
ID	LPIO3353
Full Name	Mrs Diana Calderwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green Belt land acts as an important buffer at the edge of urban development and particularly to our Chilterns Area of Outstanding Natural Beauty (CAONB) which is 'nationally important'. Green Belt land should not be used for housing developments and should be given protection</p>

	especially as it surrounds valleys and hills commanding open views. Alternative approach is to only use brownfield sites and allocate housing where infrastructure can and has been designed for growth e.g. Hemel Hempstead
Include files	
Number	Question 9
ID	LPIO3359
Full Name	Mr B. Bradnock
Company / Organisation	
Position	
Agent Name	Miss Lydia Prince
Company / Organisation	DLP Planning Limited
Position	Planner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Please see paragraph 2.17 to 2.21 in attached report.
Include files	Local Plan Issues and Options (5)
Number	Question 9
ID	LPIO3382
Full Name	Mr Phil Sawyer
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Protect the Green Belt , do not destroy it .
Include files	
Number	Question 9
ID	LPIO3416
Full Name	Mrs Ann Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The national planning rules to protect the green belt state it should only be changed in exceptional circumstances. None of these have been sufficiently demonstrated . The reasons why the green belt legislation was introduced was to restrict urban sprawl and coalescence, protect the countryside from encroachment and the

	setting and historic nature of settlements and to promote urban regeneration. Dacorum has not shown that any of the reasons can be overruled by 'exceptional circumstances'.
Include files	
Number	Question 9
ID	LPIO3472
Full Name	Mrs Louise Saul
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt land should be off limits and protected. All other options such as brownfield sites should be exhausted
Include files	
Number	Question 9
ID	LPIO3511
Full Name	Mr Ashley Martin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The purpose of Green Belt is to protect against urban sprawl. Any adjustments to Green Belt should have been completed first before allocating sites and therefore the DBC plan is flawed.
Include files	
Number	Question 9
ID	LPIO3552
Full Name	Mr Robert Bailey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt land should be sacrosanct. Once permission is given to take areas outside so that they can be built

	on then this is the thin end of the wedge and there is nothing to stop it all going in time.
Include files	
Number	Question 9
ID	LPIO3568
Full Name	Mrs Sandra Jackson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green Belt land should remain untouched for future generations. There are no circumstances exceptional enough to change any land from Green Belt. Simple. When it is gone it is irretrievable, and forever more will be just concrete and dense population.</p> <p>National Government is under pressure to retain Green Belt, so there is no need for Dacorum Borough Council to consider redesignation.</p> <p>Additionally, housing built on Green Belt will never be truly affordable for the majority of potential residents because housing developers are greedy and have shareholders to satisfy. Housing built on Green Belt will always be more expensive than infill or brownfield.</p> <p>There is no more room for new development in Dacorum and Green Belt should remain untouched.</p> <p>Re-writing the boundaries of villages is just wrong.</p>
Include files	
Number	Question 9
ID	LPIO3604
Full Name	Mrs Linda Warren
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The green belt should be protected,we need the space around our villages.
Include files	
Number	Question 9
ID	LPIO3631
Full Name	Mr Andrew Smith
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Fails to give due consideration to the Green Belt Review.
Include files	
Number	Question 9
ID	LP103639
Full Name	Ilyn horne
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 that development should not be allowed on the greenbelt and the focus should be on brownfield sites. But, whats more important, is that it is not acceptable for government or councils to review and reduce or ' earmark' any of the greenbelt or farmland in order to get more houses developed. This approach to planning is the start to coalescence and the loss of our open spaces. It i
Include files	
Number	Question 9
ID	LP103645
Full Name	mr jason funnell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	the shendish deveopment joins kings langley, nash mills, apsley and hemel - this is surely against the greenbelt desired outcome
Include files	
Number	Question 9
ID	LP103685
Full Name	MS Nicola Hutton
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><p>The Green belt areas that are being considered for development appear to be where the landowners are keen to offer for development. the land at Shendish manor has been offered and refused previously. the grounds for this refusal I would argue are the same!! The green belt is vital to prevent the merging and coalescing of Kings langley with Apsley, Hemel hempstead and also at wayside Farm, Hill farm and Rectory farm with Abbots Langley and Watford! This does not give me any confidence that all brownfield sites have been considered before Green belt sites are being considered!!!</p></p> <p><p>The development of these sites will result in the loss of valuable landscape which will not be able to be recovered!</p></p> <p><p>the Government is giving great weight to the importance of maintaining positive mental health and has made commitments to mental health services. I work in the mental health field and I am aware of the importance of access to open green spaces that is as effective, if not more so, than pharmaceutical drugs and helps to improve mood and work performance. The proposed sites use frequently walked sites, I personally use walks around wayside farm, Shendish manor on an at least weekly basis and once these areas are destroyed with the increasing urbanisation and merging of villages with Towns there is a potential impact upon the mental health and emotional well being of local residents.</p>
Include files	
Number	Question 9
ID	LPIO3731
Full Name	Mr Richard Sidwell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green Belt land should be protected at all cost. This is what defines a village or town & set's it's boundaries. It gives it's residents access to open space for well being in so may ways such as exercise and enjoyment & engagement with nature. Without green belt land we would have an endless sprawl of concrete, buildings and urbanisation with total coalescence of neighbouring towns.</p>
Include files	
Number	Question 9
ID	LPIO3747

Full Name	Mr Anthony Warren
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I don't agree with amending Village boundaries.
Include files	
Number	Question 9
ID	LPIO3775
Full Name	Mr James King
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	First there are empty houses that should be used for housing. Is the council doing enough to engage with private landlords and fill vacant properties. Then there are brownfield sites that should be developed, empty buildings and empty land can be successfully regenerated with the right plan in place, ensuring that the local infrastructure can support the site or making plans to address those issues and build them into any development plan. Green field sites should be protected.
Include files	
Number	Question 9
ID	LPIO3794
Full Name	Mr Tim Swann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I cannot believe you are even talking about development on Green Belt land words just fail me Nature cannot support more human pressure it is already creaking hello
Include files	
Number	Question 9
ID	LPIO3805

Full Name	Mrs Suzette Phair
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt is designed to protect areas from becoming too densely populated/built up and to enhance the landscape - releasing it for development is providing an 'easy solution' to satisfy the quota of housing imposed by Government and it's disappointing that it is being promoted.
Include files	
Number	Question 9
ID	LPIO3819
Full Name	Mr Michael Arrowsmith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt and farm land offers protection from urban sprawl and provides open space for town dwellers for recreation and enjoyment. Maximum effort should be placed on developing brown field sites across all of the borough rather than encroaching on green belt and farm land. Green belt and farmland should be protected at all costs as it add to the quality of life to both town and rural dwellers.
Include files	
Number	Question 9
ID	LPIO3881
Full Name	Miss D Bryant
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt is protected to stop urban sprawl. Stop and look at what you are doing. The only people to benefit are greedy Developers who have NO interest in the future of our village

Include files	
Number	Question 9
ID	LPIO3928
Full Name	Mr Brian Binmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	To only consider sites that have been offered by existing land-owners is not necessarily in the best interests of either Dacorum or the community. When the 'Role and Function of the Greenbelt' states 'The studies conclude that most of our Green Belt meets the Government's criteria for designation. There are however a few areas which don't meet all of the criteria and so could have their Green Belt designation removed. This could allow planned development to then take place.', is one of these areas that do not meet all of the criteria 'Bovingdon Airfield', an already tainted area of countryside?
Include files	
Number	Question 9
ID	LPIO3958
Full Name	Mr Tim Varley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Growth Option chosen should not be the determining factor leading to the release of Green Belt land. The only factor to be considered is whether or not the removal of Green Belt status accords with the Government criteria defining Green Belt
Include files	
Number	Question 9
ID	LPIO4003
Full Name	Mr Brian Kazer
Company / Organisation	Tring in Transition
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>Para 5.2.1 of the Plan is unintentionally misleading. We would strongly recommend that para 80 of the NPPF be reproduced in full instead of the current summary/omission of some key elements.</p> <p>Tr-h6 was concluded by the Arup Report "Green Belt Review and Landscape Appraisal Stage 2 January 2016" as "it is also almost completely constrained by AONB and has a number of other non-absolute constraints which, although don't preclude development, make it less preferential. Exclude from further assessment and retain as Green Belt." Tr-h6 should be excluded from Plan.</p> <p>Definitions of "high density", "medium density" and "low density" are needed in respect of housing developments.</p>
Include files	
Number	Question 9
ID	LP104021
Full Name	Mr R. Latham
Company / Organisation	
Position	
Agent Name	Miss Lydia Prince
Company / Organisation	DLP Planning Limited
Position	Planner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Please see paragraph 2.17 to 2.21 in attached report.
Include files	Local Plan Issues and Options (21)
Number	Question 9
ID	LP104027
Full Name	Mr Alan Johnson
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 National Planning Policy Framework (NPPF) states that 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.' The four sites identified for Kings Langley would effectively ensure coalescence with surrounding settlements on all four sides of the village. Currently Dacorum's approach to Green Belt does not reflect the NPPF. There should be more focus on key towns which are best placed to provide the full range of facilities and services required for sustainable living, rather than channelling development towards villages such as Kings Langley where services and</p>

	<p>facilities are limited and likely to remain so The focus should be on the main towns of Hemel Hempstead, Tring and Berkhamsted. In addition, there are a significant number of brownfield sites in and around Kings Langley which have outline planning permission or are being held in land banks for housing development which the Chancellor stated he would "intervene ... using direct intervention compulsory purchase powers as necessary" if there were "commercial, rather than technical, reasons" why house building was not taking place where planning permission had been granted, i.e. it had not taken place to force up prices.. The Chancellor has also said he will to introduce an expectation that LPAs deliver 20% of their housing supply at small sites, i.e. not on large areas of Green Belt..</p>
Include files	
Number	Question 9
ID	LP104048
Full Name	Mr Graham Ford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>My main concern here, as stated by other respondents, is that the plan seems to focus on those sites which are classified as green belt or were previously classified as such but now, with almost no real explanation as to why, have moved to "green field" (H2 Bovington for example) and which have been tabled as proposals for development by current owners or developers. I think a far better approach would be to stand back and consider where we want to build housing to fit with infrastructure plans, services provision realities, employment realities and delivering on our environmental targets for future generations and work from there. To compile a plan which appears to be driven mainly by articulating a series of aspirations that fits the collection of proposals being tabled by the developers seems to me to be the wrong way round entirely. I simply do not believe that long term planning of this nature should be effectively private developer led and much of what I read suggest that is the case. If the real key aspiration is the development of affordable housing for our children - something I strongly support as necessary, then imagining that such a strategic aim will be delivered by private developers seems to me to madness.</p>
Include files	
Number	Question 9
ID	LP104056
Full Name	Mrs Sarah Burgess
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt must be protected. End of.
Include files	
Number	Question 9
ID	LP104065
Full Name	Mr Andrew Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	"maximising the density at which new development is built; " - This just makes things WORSE not better - it means not enough parking spaces, not enough space between houses, and not enough space between people - which creates an unhappy and stressful environment. Green Belt should not be built on - full stop. It says above that it's there to create a barrier between other areas - but that's the tip of the iceberg. Green space keeps us healthy and happy. Green belt keeps farms working. Green Belt allows nature to flourish. It's utterly abhorrent.
Include files	
Number	Question 9
ID	LP104070
Full Name	Mr Andrew Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It should not even be considered. I spent many years waiting for a suitable property to become available in this area. But i was happy with that. it meant the area was special. The green belt is there for a reason. Taking it away will destroy the soul of the village.
Include files	

Number	Question 9
ID	LPIO4071
Full Name	Mr M. Chester
Company / Organisation	
Position	
Agent Name	Miss Lydia Prince
Company / Organisation	DLP Planning Limited
Position	Planner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Please see paragraph 2.17 to 2.21 in attached report.
Include files	Local Plan Issues and Options (37)
Number	Question 9
ID	LPIO4114
Full Name	Mr D. Smith
Company / Organisation	
Position	
Agent Name	Miss Lydia Prince
Company / Organisation	DLP Planning Limited
Position	Planner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Please see paragraph 2.17 to 2.21 in attached report.
Include files	Local Plan Issues and Options (53)
Number	Question 9
ID	LPIO4121
Full Name	Mr Graham Hoad
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Tring is blessed with wonderful surrounding countryside. Any development must respect this.
Include files	
Number	Question 9
ID	LPIO4192
Full Name	Ms Alison Sams
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Does not take into account the role of the Green Belt which is to prevent urban sprawl, give people a place to walk, run, watch wildlife and give a sense of well being on the earth. Greenbelt is a reminder that we live on this beautiful planet and not pavements and concrete. Greenbelt respects wildlife and promotes wellbeing, it gives people a chance to breathe.
Include files	
Number	Question 9
ID	LP104221
Full Name	Mr Kevin Long
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 9
ID	LP104225
Full Name	Mr Philip Homer
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 proposed development of greenbelt land is completely inappropriate.</p> <p>In Kings Langley the proposed green belt development sites would promote urban sprawl causing the coalescence of the community of Kings Langley with other larger towns.</p> <p>It would more than double the size of the current village which has already grown by 25-30% in recent years.</p> <p>The building on the proposed green belt sites would remove huge areas that act as natural drainage in the area increasing the prospect of flooding especially to properties to the east of the village as water runs off of over developed areas up the hill that used to soak up the water.</p> <p>Maximising the density of new developments is also foolish it reduces the quality of living for the people who</p>

	live there, leads to problems with access and transport as too little provision is given to parking leading to over-spill such as that on Nash Mills Lane caused by to higher density of properties at Nash Mills Wharf where the road is now dangerous due to the residents not being able to park safely on the site itself. The increased density benefits no one but the developer and the profits that they make.
Include files	
Number	Question 9
ID	LPIO4243
Full Name	Mrs Caroline Hargrove
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>You need to explore all other options. Using green belt land only benefits the developer. The local community will then pay the price for ever with the loss of countryside/wildlife and increased pressure on local resources and roads</p> <p>Will those you wish to accommodate ever get to purchase such homes?</p> <p>I wish to point out too that the selection of a Green Belt site should surely not blantly change the use and look of the surroundings- I find it shocking that Rectory Farm/Shendish/Wayside Farm and Hill Farm sites are even being considered regardless of road congestion and facilities. Each are a huge part of the local community which would be destroyed forever- but even if they were massive unused fields with no rights of way the roads at already gridlocked and the doctors and schools oversubscribed.</p>
Include files	
Number	Question 9
ID	LPIO4272
Full Name	Mr Bruce Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>DBC seems too keen to find ways to remove land from the Green Belt. The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which</p>

	should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town." I keep coming back to question of whether this is a result of it driven by ease (developers keen and can be quicker) and the higher CIL payments from Berkhamsted (£250 per square metre compared to £100 in Hemel). I trust that the councillors will endeavour to produce the best answer not the easiest and most profitable.
Include files	
Number	Question 9
ID	LP104338
Full Name	Mr David Hannah
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 that we should stand by the often quoted desire to protect 'sacrosanct' greenbelt as much as we can, particularly those areas that also function as productive farming land – given the increasing requirement post Brexit for increased food production. As the Chancellor stated in the budget as recently as Nov 2017, it is a priority to make the</p> <p>"best use of our urban land, and continuing the strong protection of our green belt".</p> <p>If, as stated in June 2016 by the Minister of State for Housing and Planning, Brandon Lewis, that</p> <p>". . . Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people."</p> <p>then I believe it is vital that time is taken to select only those large scale releases that have the capacity to deliver high volume housing with significant infrastructure elements to support quality of life within the town for existing and new inhabitants. There should be no salami slicing of small areas of greenbelt that lack this capacity, purely to deliver profits to absentee landowners and distant and disengaged developers who have no interest in the long term viability of their developments beyond completion and pay day.</p>
Include files	
Number	Question 9
ID	LP104344
Full Name	Mr Adrian Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Whilst the descending criteria for assessing possible build sites is fairly sound, we cannot and should not see this in isolation. The impact on infrastructure makes any full bloodied development of any green field sites ill judged and detrimental to the community and the habit that it will ultimately destroy.
Include files	
Number	Question 9
ID	LP104372
Full Name	Mrs Kate Quaite
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I have children and I understand they need somewhere to live in the future. Yet they will not thank us for building on Green Belt land. What are the 'exceptional circumstances' noted? Lots of Green Belt land is earmarked from what I can tell. The Green Belt land earmarked in Northchurch will mean an end to the village as it becomes a town of its own with a new school and doctor's surgery. The urbanisation of the village has contributed to a tragic loss of life and raises further safety concerns on the High Street. These are the very real effects of 'sprawl' as you put it.
Include files	
Number	Question 9
ID	LP104387
Full Name	Mr Clive Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belts were designed with the intention to retain a green space between excessive development. This has not changed. You are changing the rules now to claim "you can build on green belt land". What is the point of making laws when you can change them at a whim
Include files	
Number	Question 9
ID	LP104480
Full Name	Mrs Felicity Bond

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No, preserve the Green Belt, that was it's designated for - and either add new houses to much larger towns that have existing infrastructure to support them, or build new towns/villages with new supporting infrastructure in non Green Belt rural areas.
Include files	
Number	Question 9
ID	LP104515
Full Name	Mrs Alexandra Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Government Policy that there will be NO building on Green Belt Land in London and the Home Counties. This would appear to be at odds with all of your options. Wildlife and green space is important to everyone on the planet. I oppose Shendish manor development and all developments on Green belt land my house looks across to the green tree lined fields and I see deer, birds, rabbits living here! Where will they go? I believe that pollution in the local area would increase due to the additional traffic but the loss of the green belt land that absorbs the pollution will be gone too!
Include files	
Number	Question 9
ID	LP104547
Full Name	Mrs Alison Williamson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt must be protected at all costs. The NPPF states five purposes of green belt . To check the unrestricted sprawl of built up areas To prevent merging of neighbouring towns

	<p>To safeguard the countryside from encroachment</p> <p>To preserve the setting and special character of historic towns</p> <p>To assist urban regeneration</p> <p>The new proposed development plans is the complete antithesis of these safeguards and purposes.</p>
Include files	
Number	Question 9
ID	LPIO4552
Full Name	Dr Alasdair Malloy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There has not been sufficient consultation with local residents and businesses about the impact of all of this on the area.
Include files	
Number	Question 9
ID	LPIO4559
Full Name	Dr Alasdair Malloy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt sites should be removed from the plan to safeguard the for future generations.
Include files	
Number	Question 9
ID	LPIO4560
Full Name	Dr Alasdair Malloy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt sites should be removed from the plan to safeguard the for future generations.
Include files	

Number	Question 9
ID	LPIO4586
Full Name	Mrs Susan Bishop
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Build on Brown Field sites only!!!! Green Belt is designed to be kept as the word suggests 'GREEN'!!! Greenbelt to be left and protected for the use of wildlife and nature only!
Include files	
Number	Question 9
ID	LPIO4592
Full Name	Mrs Caroline Nickalls
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt provides a sense of openness between built up areas and is essential to give people a clear sense of belonging to their town/village and of where the countryside/rural surroundings start. Green Belt is precious and we need to think ahead for future generations.
Include files	
Number	Question 9
ID	LPIO4640
Full Name	Mr Adam Trigg
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Building on green belt - this is irreversible. Immediately the boundary between town and country is gone.
Include files	
Number	Question 9
ID	LPIO4653

Full Name	Mr Patricia Wheway
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 NPPF paragraph 79 states that the fundamental aim of the green belt is to prevent urban sprawl. If Kings Langley green belt land is developed for housing or offices we will lose our historic village and merge into Hemel Hempstead.</p> <p>The Governments policy is that Green belt land should not be considered until brownfield sites have been exhausted. DBC have not done a thorough job of identifying brownfield opportunities around the Borough and this is what they need to do.</p> <p>Green belt can only be developed as a last resort and with the agreement of local people (see Brandon Lewis Housing Minister letter which is still Government policy.</p> <p>Also see case law regarding exceptional circumstances and very special circumstances. Housing need is not enough to mean green belt land can be used for housing.</p>
Include files	
Number	Question 9
ID	LPIO4676
Full Name	Mrs Maria Kennedy
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 purpose of the green belt is to keep the open nature of the space between towns.</p> <p>The councils approach appears to only consider the view from the road between these towns. Driving from Kings Langley to Hemel does not reflect how green the space is between these towns as there are houses aside the road but green fields behind which cannot be seen from the road.</p>
Include files	
Number	Question 9
ID	LPIO4678
Full Name	Mr Keith Bradbury
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 9
ID	LP104787
Full Name	Mrs Sara Cooke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	You are ignoring previous Green Belt reviews by a series of planning inspectors. They stated that you should not be expanding into the green belt in Berkhamsted and Tring. These are small towns that do not have the infrastructure to handle a large number of new houses and the subsequent traffic that the people in the new houses will bring. It seems that you are only looking at the latest Green Belt review commissioned by Dacorum that concludes that snipping away at the green Belt is acceptable. This whole review's emphasis is on finding parts of the Green belt that can be "wriggled out of" on technicalities, regardless of local residents views, rather than looking at ways to maintain green fields on the edge of town that so add to our environment. To take the excuse of building line, for example, completely misses the point that having chunks of fields within in the building line is part of the original aim of the Green Belt, otherwise we would all be living in square shaped towns, which does not fit in with the vision. Another "excuse" is that established hedgerows shield a potential site from view or create a natural boundary; no account is taken of the fact that the hedgerows are so high because the developer land owners have deliberately not cut them for the past ten years - is poor land management to be rewarded?
Include files	
Number	Question 9
ID	LP104802
Full Name	Mrs Susan Bishop
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	NO! NO! NO! Build on Brown Field sites only, not Green Belt!
Include files	
Number	Question 9
ID	LPIO4806
Full Name	Mrs Deborah Ludlow
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt should not be developed on or destroyed in this manner. There is not the infrastructure in place to support these developments and the impact on the environment would be a disaster.
Include files	
Number	Question 9
ID	LPIO4812
Full Name	Mrs Susan Bishop
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Using any existing brownfield sites first must have the highest priority. No Green Belt should be considered without looking properly at all brownfield options
Include files	
Number	Question 9
ID	LPIO4819
Full Name	Dr Jane Leithead
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The greenbelt needs to be protected, to avoid irreversible destruction of valuable nature and environmentally significant areas. As such, it should not be built upon for housing or industry, particularly without the infrastructure needed to support it.
Include files	

Number	Question 9
ID	LPIO4820
Full Name	Dr Jane Leithead
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The greenbelt needs to be protected, to avoid irreversible destruction of valuable nature and environmentally significant areas. As such, it should not be built upon for housing or industry, particularly without the infrastructure needed to support it.
Include files	
Number	Question 9
ID	LPIO4835
Full Name	Mr Simon Scott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The checklist in 5.2.7 is not just within Dacorum Council. What studies have been done to see if brownfield sites for example in London have been fully used? Further within Dacorum what studies have been done to maximise brownfield sites across all sites? It appear proportioned housing numbers have been allocated to areas which are then worked out where they go in that town/village/hamlet. How about going from the bottom up - how many houses can you fit on brownfield sites, then underused lands and so on? What results does this bring? Berkhamsted has already delivered double the number of homes per annum base don the 2006 plan while Hemel is 21% behind despited a roughly £30m investment in regeneration...
Include files	
Number	Question 9
ID	LPIO4848
Full Name	
Company / Organisation	Watson Howick
Position	
Agent Name	Mrs Julia Riddle

Company / Organisation	Castle Planning
Position	Director
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In terms of the approach to the Green Belt, it is right that the Council's approach should reflect the priorities of National Planning Policy.</p> <p>The NPPF confirms that great weight should continue to be attached to the protection of the Green Belt and it is clear that the boundaries of the Green Belt should be established in the Local Plan. However, at the time a Local Plan is being prepared or reviewed, consideration should be given to the boundaries, so that they are capable of enduring beyond the plan period. Among the considerations to be addressed are:</p> <ul style="list-style-type: none"> • The level of consistency between the Green Belt and meeting requirements for sustainable development. • Whether or not the five purposes of the Green Belt are being fulfilled. • The need to identify safeguarded land; and • The need to be confident that the boundaries will not have to be altered later in the Plan period. <p>The preparation of Dacorum's existing Plan did not include a comprehensive assessment of the Green Belt, encompassing all the elements referred to above.</p> <p>It has however been recognised as part of this new Local Plan process, that to meet the housing needs in the area, there is likely to be the need to develop some Green Belt land and the relevant work has been undertaken to identify and assess sites, in this context. The Core Strategy considered that a strategic review of Green Belt boundaries was not suitable, but some small-scale releases were considered as part of a wider assessment of potential sites. These were assessed through the Core Strategy process against a range of issues, including infrastructure capacity, transport and accessibility, economic development opportunities and conformity to established New Town principles.</p> <p>At this stage, Dacorum committed to undertaking a rigorous and comprehensive review of the Green Belt through a Plan review, to ensure that a justifiable balance between meeting housing need and protecting the Green Belt could be secured. The Inspector to the Core Strategy considered that without such comprehensive evidence, a robust conclusion on the potential for the identification of additional housing sites, either for the medium/long term (as potential sites within the urban areas decrease) or for beyond the Plan period, could not be satisfactorily drawn. It was therefore concluded that to reflect advice in paragraphs 89 and 90 of the NPPF, the Council needed to clarify their position with regard to the re-use of existing buildings and the redevelopment of previously developed land in the Green Belt.</p> <p>The process of adoption of the existing Core Strategy was therefore clear in terms of the Council's need to look carefully at the need for development in the Green Belt and to assess sites and areas for their suitability for development, to meet identified need. This has been</p>

started through the Green Belt Review and Landscape Appraisal work which supports this draft Plan. This work concludes that some areas of Green Belt meet the Government's criteria for designation, but that there are some areas which do not and could therefore have their designation removed and be further considered for development.

As set out in the draft Plan, "a key purpose of Green Belt is to preserve a sense of openness between built up areas, together with factors such as protecting the countryside from development and supporting urban regeneration".

There are other characteristics of Green Belts which should also be considered, to be sure as to whether sites in the Green Belt meet these functions or exhibit the expected characteristics of the Green Belt. Consideration should therefore rightly be given to other factors as identified, including; accessibility and proximity to infrastructure and the potential impact of any development on the character of the town or village.

There are factors which need to be resolved before it can be clarified as to exactly which sites are to be developed, most notably the final target growth figures, but it is agreed that consideration should be given to Green Belt sites, particularly where they can deliver sustainable and accessible development, which makes best use of a site. This is especially relevant where these sites do not exhibit the characteristics of their designation and where, on balance, they can make a positive contribution to local needs through their development, with limited impact on the neighbouring town or village and surrounding landscape.

In the case of the site at Cow Lane/ Station Road, Tring, it is in a sustainable location, in close proximity and with easy access to both the existing town centre of Tring and the railway station. It is positioned to make use of the existing bus route and facilitate pedestrian and cycle access not only from and through this site, but from other sites being promoted in this area, should they be taken forward, to improve their sustainability. Most notably, it would significantly enhance the sustainability of potential neighbouring sites, such as tr-h5, through the provision of pedestrian and cycling links through this site from tr-h5 through to Station Road.

Site tr-h4 is also in a sheltered location on the edge of the settlement and, as such, does not strongly exhibit the characteristics of the Green Belt and could be developed in a sensitive manner to limit the impact on the landscape and views and to bring about qualitative improvements.

Views are specifically sought in terms of the approach to village boundaries, as shown on the policies map. It is agreed that there should be some flexibility allowed around these areas. Although village boundaries themselves have some benefits, there is logic to an approach which allows for consideration of the impact of any proposed development on a case by case basis, so that the benefits of that development can be weighed against the impact, as opposed to an 'in-principle'

	opposition to development outside of these defined boundaries.
Include files	
Number	Question 9
ID	LPIO4880
Full Name	Mrs Beverley Griffiths
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As we have already lost 82 hectares of land which have been removed from the Green Belt, the new local plan needs to prioritise the Green Belt land we have left. This is not a current policy to remove green belt land.
Include files	
Number	Question 9
ID	LPIO4896
Full Name	Mr Pdraig Dowd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green Belt is a common and limited resource that should only be considered after other options are exhausted. It is fundamental to good social communities, accommodation, living, etc. It is essential to the vision that you outlined earlier and so encroaching on it runs counter to achieving that vision.</p> <p>DBC seems to have a flexible approach to what its policy is in this regard which makes it difficult to respond. A simple question to you is what 'Green Belt' is not touchable?</p> <p>Efficient use of already built-on areas and brownfield should be the first targets, having met the wider set of planning objectives.</p> <p>Your local maps do not make clear what is Green Belt and what is simply agricultural land; leaving that aside, it seems that there is much agricultural land that should be the source as it offers more opportunities for balanced, sustainable and integrated development and then in a more logical extension of DBC today. You fail to address this big topic.</p>
Include files	
Number	Question 9

ID	LPIO4914
Full Name	Mr Patrick Ludlow
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	the increasing development of the village and its environs combined with a lack of suitable road and traffic network has already had a damaging impact in the area. this development would only make this worse. there are a number of brownfield site options that should be explored before more green belt is taken up with development, meaning the loss of amenity and valued landscape.
Include files	
Number	Question 9
ID	LPIO4915
Full Name	Mr Roger Jackson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	5.2.2 Government policy states that most types of development should not be allowed in the Green Belt. Seems clear to me what government policy is as stated in paragraph 5.2.2, and yet for Tring 100% of all the development is proposed to be in Green Belt land with one plot (Tr-h4 on Cow Lane) being in the Chiltern area of outstanding natural beauty. Let us not forget the effort that was put in many years ago to establish the green belt. The reason for it then are as valid today as ever they were, if not more so.
Include files	
Number	Question 9
ID	LPIO4945
Full Name	MR Russell Berman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>It plays down the importance of the Green Belt which is designed to prevent urban sprawl by maintaining open areas between built up areas.</p> <p>Areas such as Shendish, Wayside Farm and Rectory Farm have all been refused planning permission in the past, with planning citing the benefits of the Green Belt, preventing coalescence, each has flooding issues, offers recreational space and valuable amenities.</p> <p>Consideration of impact on the character of our towns or villages is fundamental, which will safeguard future generations</p> <p>This document also states that Kings Langley has capacity for a further 50 homes whereas the proposals are looking at an addition of thousands of homes. This in itself points to the plans being out of scale and disproportionate. The Plan doesn't go far enough to ensure we make use of brownfield sites, disused and run down properties and instead is just intent on forcing a large number of properties on areas which cannot cope.</p>
Include files	
Number	Question 9
ID	LP104975
Full Name	Mrs Nicola Botha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green belt is not just about protecting London sprawl it is a local protection to stop urban spread between communities, it is insulting to diminish green belts purpose to state in this case it is about London. We moved to this village to bring up our children In a village atmosphere, disregarding green belt robs our children of their right to live In a village community. We do not wish kings Langley to become a joined up suburb filling the small gaps between Watford and Hemel Hempstead. It will lose its village appeal and there is neither the infrastructure nor employment opportunities to support this. Brownfield sites must be considered first and if the council deems exceptional circumstances these must be transparently explained.</p>
Include files	
Number	Question 9
ID	LP105017
Full Name	Mr Chris Lumb
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 have given my opinion as 'No' because I have strong reservations about the proposed approach. The Government's view on the Green Belt and its preservation has been set out in the NPPF and in a number of ministerial statements, including a recent statement by the Chancellor of the Exchequer. This, of course has also been clearly set out as background material in the Green Belt Review. In essence, I agree that Dacorum should follow the guidance in the NPPF "to make best use of brownfield sites and supporting their regeneration; make best use of land which is currently underused, including land owned by the public sector; maximise the density at which new development is built; and explore whether any other Councils can help meet some of its local needs", but I do NOT see any indication anywhere in the text that they are proposing to temper this approach by giving due consideration to the relative effectiveness of the degree to which which previously assessed housing needs have been met in the different sub-areas under review. In particular, Berkhamsted has seen new housing built to a level some 34% or more over that proposed in earlier plans, with a similar amount of new housing (600+ units) already 'on the stocks'. By contrast, Hemel Hempstead has seen only 79% of its proposed new housing built over the same period, and - bearing in mind that Hemel Hempstead is a much larger town than Berkhamsted, this 21% shortfall must represent a considerably larger number of houses not built, compared with those that have already been built in Berkhamsted. Clearly, there is a pressing need for Hemel to catch up with its smaller neighbour before Berkhamsted comes under undue pressure to be even considered for expansion beyond what it already has 'in the pipeline'. And there are many arguments that, even then, proper consideration should be given to the 'Market Town' nature of Berkhamsted, together with its location in a narrow valley which really precludes infrastructure development that would be needed to cope with any further expansion.</p> <p>I do not accept the way in which the Green Belt has been split up into 'parcels' so that each can be picked off as a single entity, when the whole basis of having a green belt is that it is the cumulative effect of the green belt as a whole that serves to achieve the stated objectives. Neither do I accept that 'filling in' the area between the existing town and the by-pass around Berkhamsted is acceptable - all this would be in effect would be 'urban sprawl' plain and simple - adding to all the problems set out elsewhere that Berkhamsted faces in terms of infrastructure and setting.</p>
Include files	
Number	Question 9
ID	LP105148
Full Name	Mr Martin Smith

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	To quote above 'Almost 85% of our Borough is rural. 60% of this area, and just over half of the Borough is designated as Green Belt. A key purpose of Green Belt is to keep a sense of openness between built up areas (in this case around London), together with other factors such as protecting the countryside from development and supporting urban regeneration. Green Belt also provides opportunities for people to access the countryside, to grow food and support nature conservation.' How can building on one of the last dairy farms in the area and green belt land around Kings Langley be supporting this view? Clearly brownfield sites need to be developed first
Include files	
Number	Question 9
ID	LPIO5157
Full Name	Mrs Ruth Bareham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	If the purpose of Green Belt land is to stop urban sprawl and to retain a sense of openness between developed areas, the proposals for Kings Langley fall significantly short. There have been no exceptional circumstances provided to warrant amending boundaries or classification and as such these should be considered as a last resort. There appears to be little emphasis on re-developing existing sites or building on suitable Brownfield sites.
Include files	
Number	Question 9
ID	LPIO5245
Full Name	Mr Nicholas Ring
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The green belt must be protected from unsustainable development. Our fathers fought for my generation and I owe it to the future generations to protect and preserve our green belt land.
Include files	
Number	Question 9
ID	LPIO5264
Full Name	Mr Gary Ansell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As previously stated, government policy does not support developing Green Belt unless the council have exhausted all the brownfield options and I do not believe enough exploration of such sites has been done. With respect to Kings Langley the vast majority of the village do not agree with developing the Green Belt site options located in and around the village and therefore there is no local support for any development. One of the sites is a working dairy farm, the land being owned by HCC. It is inconceivable that DBC should even consider putting forward land owned by the County Council and which should not be put up for sale for reasons of being appropriate for development.
Include files	
Number	Question 9
ID	LPIO5313
Full Name	Miss Giulietta Cinque
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	"A key purpose of Green Belt is to keep a sense of openness between built up areas" by building on greenbelt land you take away the very openness you state you are trying to keep. It's totally hypocritical. People live in villages and rural towns for this very reason. Not for it to be taken away. In relation to Kings Langley, the high quality landscape is visible and much enjoyed by residents all over the village as a result of the elevated slopes of most of the adjacent Greenbelt area, Wayside Farm, Shendish. While appreciating the need for new affordable housing, the losses to the landscape would not be balanced by

	<p>the benefits of addressing this type of housing need, but affordable housing built here, is quickly driven by market forces to price levels beyond the reach of those in most need. The social housing stock sold off for a pittance by the greed of the Tories in the 80's under the right to buy scheme needs to be replaced, but in the places it is ACTUALLY needed, ie where there are jobs.</p> <p>We need to protect our farms and greenbelt.... leave it alone</p>
Include files	
Number	Question 9
ID	LPIO5377
Full Name	Mr Reuben Bellamy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The broad approach set out complies with current government policy set out in the NPPF for reviewing green belt boundaries. It should be noted that housing need has been found to constitute the necessary exceptional circumstances in numerous local plans.
Include files	
Number	Question 9
ID	LPIO5396
Full Name	miss tracy flint
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt should be left alone, its there for a reason. Not to be built on!!
Include files	
Number	Question 9
ID	LPIO5462
Full Name	Mrs Margaret Stanier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Paragraph 5.2.4 is very misleading. Areas do not have to fulfill all government criteria in order to be an essential part of the Green Belt. It suggests that substantial areas of Green Belt do not need to be protected which is simply not acceptable.</p> <p>On the other hand, why is Bovingdon airfield not identified as a Green Belt area which could be developed?</p>
Include files	
Number	Question 9
ID	LPIO5476
Full Name	Mr Garrick Stevens
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 approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas and fails to have due regard for the extent of AONB surrounding the settlements..</p> <p>Following the Examination in Public, the Inspector's report [July 2013] records</p> <p><i>"However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town. "[para 39]</i></p>
Include files	
Number	Question 9
ID	LPIO5518
Full Name	Mr Robert May
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt should be preserved at all costs.
Include files	
Number	Question 9
ID	LPIO5574

Full Name	Mr Michael Ridley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A major development site could include Bovington Airfield, which does not to have been considered.
Include files	
Number	Question 9
ID	LPIO5593
Full Name	Mr Quentin Ross-Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The whole Green Belt policy is flawed. The 'Major Development Sites' need to be removed from the plan. What will a village such as Kings Langley look like in the future for our children and grandchildren. The removal of any Green Belt land will affect the overall nature of a village such as Kings Langley.
Include files	
Number	Question 9
ID	LPIO5611
Full Name	Mrs Christine Cosgrave
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I agree with the statements but your local plan proposed doesnt really follow these points so I am left feeling that you are merely making statements which will appease people but in actuality you will do what you want with no regard to current infrastructure, transport availability etc
Include files	
Number	Question 9
ID	LPIO5633
Full Name	Mr Nigel Vanner
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt land is essential for preserving the openness between the places where people live and maintaining the wellbeing of the population. No rationale is provided for why our Green Belt fits the designated Exceptional Circumstances and should be destroyed in favour of building houses. Also much greater emphasis needs to be placed on the four point checklist as recommended by the government in their Housing White Paper. Surely the common sense approach is to exploit all brownfield land and maximise the use of land already owned by the authority.
Include files	
Number	Question 9
ID	LPIO5644
Full Name	Erica Sutton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Re. the checklist at 5.2.7 - Dacorum could expand this checklist to include exploration of empty properties in the area (whether existing residential or buildings of other use with the potential for conversion) and whether these could meet some of the demand. Using existing stock with existing utilities in place would make better use of resources and be more environmentally responsible than starting a site from scratch whether it is brown or green field. There have been a number of articles in the media this year on this topic, in everything from the Telegraph to the Big Issue. These have focused on the big cities where there are several thousand empty homes available. Has the potential been explored in Dacorum and if so what is it? If not, why not? There is a call for people to come forward if they know of potentially suitable land available for development, but there is currently no call to come forward for potentially suitable property that could be reused, so that is a gap that could be filled.
Include files	
Number	Question 9
ID	LPIO5668
Full Name	Mr Alastair Greene
Company / Organisation	Little Gaddesden Parish Council

Position	Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 9
ID	LPIO5724
Full Name	Mr Adrian Ward
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There should be NO development of greenbelt land ever - that is why it was designated as greenbelt!!!! Note the Governments' criteria for designation - the government doesn't live here and the local voter's opinions should be taken into account
Include files	
Number	Question 9
ID	LPIO5745
Full Name	Mrs Annette Patterson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No this is not properly outlined , the area is already congested it can take 30 minutes to get through the village in the mornings. The current developments in Apsley prove how the infrastructure is not considered properly in plans and the outcome is significant congestion and traffic pollution in the area.
Include files	
Number	Question 9
ID	LPIO5786
Full Name	Mr Brian Johnson
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	no development on greenbelt
Include files	
Number	Question 9
ID	LPIO5812
Full Name	Mr Michael Lelieveld
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In June 2016, Minister of State for Housing and Planning, Brandon Lewis MP, stated in a letter that “..Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of the local people”. He also said “We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries”. Given these statements of central government policy, the Local Plan process should give far greater weight to the views of the local people. Their experience of development in the first 10 years of the Core Strategy does not suggest that both recently built and the approved (but not yet built) development schemes are sustainable. This is before consideration is given to any future new developments.</p> <p>We strongly agree with the points made in 5.2.6 that the Local Plan must consider other factors including the sustainability of proposed developments and how they would affect the character of local towns and villages. The Chiltern AONB would be a factor in any analysis.</p> <p>However, the assessment in 5.2:</p> <ul style="list-style-type: none"> - References the Green Belt review which was robustly challenged by local residents at the time. These and the conclusions of the Planning Inspectors should have had far greater bearing on the conclusions reached here; - Significantly plays down the role Green Belt has in separating built up areas. Such separation is already being eroded by approved (but not yet built) developments adjacent to Berkhamsted, including the developments around Potten End; - Does not consider the cumulative impact of the 5-year rolling planning process and the risk of an incremental attrition of the Green Belt over the life-span of the Local Plan. <p>We ask that the Council revisit these issues during the next phase of the process.</p>
Include files	
Number	Question 9

ID	LPIO5815
Full Name	Mr Roy Farrant
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The plan states that: "We also need to consider how sustainable these areas would be if they were developed. For example, how could they be accessed, could they provide the necessary infrastructure needed to support the development and how would they affect the character of the town or village?". Kings Langley has had some major development of brownfield sites in the last few years: the Ovaltine Estate adding a significant number of new homes to the village. The result is that pressure on the village shopping street and other local roads is already very high, with traffic at a standstill on the main thoroughfare for most of the day. Any large development of new homes or offices in and around the village will only exacerbate this. In addition, the character of the village (currently with a significant proportion of its buildings in a conservation area) will change enormously and it will be close to becoming a town, at risk of being amalgamated into Hemel Hempstead and/or Watford.
Include files	
Number	Question 9
ID	LPIO5869
Full Name	Mr Philip Catchpole
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 9
ID	LPIO5906
Full Name	Ms Fiona Coulling
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	The main concern is about the sustainability of any growth, especially when green belt is being used.
Include files	
Number	Question 9
ID	LPIO5977
Full Name	Mr Paul Craig
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 9
ID	LPIO5979
Full Name	Mr Paul Craig
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 9
ID	LPIO6063
Full Name	Mr Fred Preston
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt land as currently designated should be kept. Once Green Belt land is lost it can never be replaced and its use is not sustainable. Building on areas of Green Belt would create urban sprawl, coalescing villages and towns and joining Hemel Hempstead to Watford.
Include files	
Number	Question 9
ID	LPIO6081

Full Name	Mr Richard Tregoning
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Care must be perpetual to balance development and Green belt
Include files	
Number	Question 9
ID	LPIO6091
Full Name	Dr Melvyn Else
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	DBC have used consultants to review the Green Belt in the area and while these consultants favour an erosion of the Green Belt they do not fully consider using existing urban sites. Nor do they explain how the infrastructure will be provided. Sustainable sites require far more than is being considered. Health, schools, accessibility are essential but ignored. More importantly any evidence that available sites within urban areas are being fully developed is omitted or not considered.
Include files	
Number	Question 9
ID	LPIO6130
Full Name	Mr Graham Cordery
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The green belt should not be developed and must be protected. Once it's gone, it's gone for good. The green belt areas define the character of Kings Langley. Alternative brownfield sites should be sought.
Include files	
Number	Question 9
ID	LPIO6179

Full Name	Mr Scott Bennett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	You are obviously still missing the fact that you are trying to bend the law on land to do as you please
Include files	
Number	Question 9
ID	LPIO6187
Full Name	Mrs Helen Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The proposed sites suggested around Kings Langley and Shendish will result in the village becoming a suburb of Hemel and loose its character.
Include files	
Number	Question 9
ID	LPIO6189
Full Name	Miss Lucy Muzio
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No, everywhere you have suggested to build especially Hemel east, counteracts everything said in the first paragraph. To many things will be effected if you build HH-H1B. It's a flood plane, working farms and the land, horse riders will be effected due to building over the only bridle paths and safe paces for them to go. The badgers sets and red kites nests and the bats. Cyclists who ride up there to avoid the roads.
Include files	
Number	Question 9
ID	LPIO6242
Full Name	Ms Ann Hetherington

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 with most of your points but the original idea of the green belt was a forward thinking planning concept, which has proved invaluable in preserving our countryside. While I accept that there is a need for new housing, there has to be a very clear idea of at what point green belt land can be sacrificed. From my experience of planning so far, the line of the belt seems to be able to be redrawn at will to fit with development opportunities. I would like clear criteria for when it can be used and a stated policy that boundaries are redrawn only as a last resort. Unless things are very clear, it will slowly be eroded away by successive plans. We should be fighting to preserve it.
Include files	
Number	Question 9
ID	LPIO6247
Full Name	Mr andrew miller
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Preserving the Green Belt should be a primary factor in any development plan, these areas provide the necessary environment for hedgerow wildlife and the ability to combat against environmental pollution.
Include files	
Number	Question 9
ID	LPIO6250
Full Name	Mr Brian Goddard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There is plenty of brownfield sites to use around HH before changing green belt
Include files	

Number	Question 9
ID	LPIO6272
Full Name	Mrs Beryl Irvine
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 9
ID	LPIO6317
Full Name	Miss Tamara Felstead
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I do not agree that the Strategy should include any tempt to erode the Greenbelt or impact the working farms within the area.
Include files	
Number	Question 9
ID	LPIO6345
Full Name	Mrs Clare Joyce
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Because you haven't really given a coherent approach to the green belt. Your "approach" seems to be that you will use the caveat that it may be permitted to build on green belt if it is regarded as sustainable development. That's not an approach; that's wanton vandalism.</p> <p>Not all green belt is equal of course regardless of the rose tinted glasses it is viewed through. Some is valuable: such as farmland or that that acts in our borough as a buffer between the built environment and the AONB. Some is no more than scrubby wasteland. There needs to be a more qualitative assessment of the green belt to assess the quality of it before it is considered to be built on.</p>

	There does need to be a greater recognition, perhaps not recognised in national strategies, that the green belt does act as a “buffer” to protect the AONB.
Include files	
Number	Question 9
ID	LPIO6387
Full Name	Mrs Rachel Macdonald
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The plan is looking to build on green belt land in and around Tring and Berkhamsted. Hemel Hampstead is better suited to major development. Please see attached report
Include files	Issues and options reponse (1)
Number	Question 9
ID	LPIO6391
Full Name	Mrs anna silsby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Development on Greenbelt land should only be a last resort. It will never come back; and fundamentally alters the look and feel of a town or village once build-upon. In case development on Greenbelt land is required; this should in all cases only relate to small scale developments; not Major Development Sites.
Include files	
Number	Question 9
ID	LPIO6443
Full Name	Mr Patrick Walsh
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	The destruction of green belt land is indefensible and irreversible. It may be a cheaper short term option, but should not be pursued.
Include files	

Number	Question 9
ID	LPIO6465
Full Name	Mrs Pamela McLaren
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt land should be preserved as such at all times and any development, housing or commercial, should be on brownfield sites. There are plenty around and these should be used to ensure that the countryside remains as such and village boundaries maintained.
Include files	
Number	Question 9
ID	LPIO6474
Full Name	Mr Andrew Lambourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No in that it needs to deliver a more robust approach towards protecting Green Belt from erosion, particularly where near AONB. For example to develop proposed site WA/8 at the west side of Flamstead and adjacent to the AONB would be inappropriate because it would compromise the character of a "selected small village in the green belt". Small villages are a valuable part of the character of this rural area and eroding the Green Belt around their boundaries would be to change forever what makes Dacorum so special, as well as to overtax the limited infrastructure in terms of roads, parking, amenities, schools, water and sewerage.
Include files	
Number	Question 9
ID	LPIO6486
Full Name	Mr Andrew Lambourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	Protection of the rural nature of Dacorum through its rural areas, AONBs and green belt is of great importance
Include files	
Number	Question 9
ID	LPIO6494
Full Name	Mr Topan Dutta
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Generally yes to respect green land but HS2 show this is not sacrosanct
Include files	
Number	Question 9
ID	LPIO6535
Full Name	Mr Stephen Clarke
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 9
ID	LPIO6538
Full Name	mrs gillian marin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	green belt is to separate towns. all of the proposals around kings langley will join KL to hemel or abbots. the green belt should be off limits
Include files	
Number	Question 9
ID	LPIO6668
Full Name	miss Daphne Kirst

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt needs protecting and biodiversity increased
Include files	
Number	Question 9
ID	LPIO6677
Full Name	Mr Nick Hollinghurst
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Whereas the Green Belt regulations and legislation are important planning tools that are currently under strain in the South East and East of England Regions this is not true of the rest of the country.</p> <p>The Green Belts and the Town & Country Planning Acts have undoubtedly saved the UK from sprawling ribbon development and preserved the integrity and characters of our smaller, historic towns. The country would be far less attractive if, in particular, the Green Belts did not exist.</p> <p>The Planning Authority must defend the principle of the Green Belts and apply existing policies strictly so that the "exceptional circumstances" under which GB development is currently permitted, can only come into play after one of other of the stated permitted uses has been prior approved - i.e. a double test. A request by central government to consider a "de-greening" should not be considered a sufficient reason to overturn any of the 5 purposes of Green belts as defined in national policy.</p>
Include files	
Number	Question 9
ID	LPIO6751
Full Name	Andrea Bartlett
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 9
ID	LPIO6776
Full Name	Mr Graham Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A statement should be added that the Green Belt should be used to support the Chiltern AONB in controlling the unique landscape and setting of that area.
Include files	
Number	Question 9
ID	LPIO6778
Full Name	Mr Geoff Latham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The existing Green Belt policy, whilst laudable in restricting the ribbon development of the 1920s and 30s and preventing the easy pickings of virgin sites over redevelopment, is an over-reaction in that boundaries have been too tightly drawn around existing settlements, in some cases being drawn through the middle of hereditaments. This has unfairly restricted the development of land on the boundary and caused tensions by restricting the organic growth of settlements, which had previously given them their charm. This error should not be perpetuated by having realistic, definable boundaries, The original intention of providing a means of assessing whether land designated as "green belt" could be developed was interpreted as a cast iron refusal of consent if it was.
Include files	
Number	Question 9
ID	LPIO6822
Full Name	Mrs Jenna Selby
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green Belt land was designated for a purpose, to stop urban sprawl. It should not be considered for any development.</p> <p>Green Belt is one of the main things which attracts people to live in the area.</p>
Include files	
Number	Question 9
ID	LPIO6886
Full Name	Bradford Gunn
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 above approach is wonderful in theory but based on what is being proposed is not realistic or achievable.</p> <p>As highlighted earlier given that significant brownfield sites in Bovingdon (the airfield, the Bobsleigh and no doubt more on closer inspection) have not been seriously considered the Green Belt is not being properly protected.</p> <p>The problem is compounded in Bovingdon (and no doubt in other communities) by the fact that in selecting sites to be 'taken out' of the Green Belt existing infrastructure problems and future requirements have not been acknowledged or addressed which will further negatively impact the quality of life for current as well as future residents.</p> <p>Only larger communities have potential for the scale of development necessary to generate the developer funding required to properly address such problems. Has Dacorum considered high rise developments around the Magic Roundabout (BT Building and Car Wash) and near Hemel Hempstead Station?</p>
Include files	
Number	Question 9
ID	LPIO6929
Full Name	Mrs Anna Corrigan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	I do not support the proposal of building a large amount of dwellings in such a small village such as Markyate, when larger towns, with more adequate amenities and services and infrastructure would cope far better. The already struggling roads, and lack of parking in our tiny village can not be stretched any further. These proposals are clearly made by people who do not understand the current problems already faced here, or simply do not care about exasperating matters further.
Include files	
Number	Question 9
ID	LPIO6947
Full Name	Mr Edward Castle-Henry
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I am very encouraged to see the use of sustainable development here, which would best be suited to building on greenbelt land. For the areas which dont meet all the criteria, I think if possible you could try and work them up to the right criteria. Its hard to say exactly without more details about what they are missing, but in essence, try and protect these areas still instead of letting them get developed, and if developments do take place, focus those on the areas which is not up to the standard, which would allow the rest of the greenbelt area in question to once again meet the standard required.
Include files	
Number	Question 9
ID	LPIO6995
Full Name	Miss rebecca holt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Part of the very reason for having a Green Belt is to stop built areas merging into one another. If the residential developments are taken forward in Bovingdon and Kings Langley they will start to merge into their adjoining villages. We are so lucky to have this open space, greenfield land and working farms such as Wayside Farm on our doorsteps and this development will destroy it. The Green Belt is that - Green Belt and it should be

	<p>preserved. There is no point in having designations if they can just be changed and taken away.</p> <p>Dacorum must push to retain the green belt boundaries and resist over-development of villages within it.</p>
Include files	
Number	Question 9
ID	LPIO7036
Full Name	Mr Adrian England
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Parts of the Greenbelt should be traded with brownfield sites which cannot be developed due to traffic pollution hotspots and could instead become fallow recreational greens. I would like to see a ring of new towns beyond the Greenbelt, which would reduce pressure on development in sensitive areas. Developers need to be given new targets, to divert them from the existing ones. This opportunity could be taken to invest in Patient-flow hospitals and re-configure provision of health infrastructure.</p>
Include files	
Number	Question 9
ID	LPIO7057
Full Name	Mrs Gillian Lumb
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 report by the Chilterns Society on the Cumulative effects of development on the Chilterns AONB.</p> <p>Also DBC has ignored material put forward by BRAG.</p> <p>It seems very strange to me that so much detail of possible developments on the several Green Belt sites should have been undertaken when these sites have not yet even been released from the Green Belt.</p> <p>Previous decisions about the Green Belt by planning inspectors have been ignored.</p>
Include files	
Number	Question 9
ID	LPIO7099

Full Name	Mr & Mrs Fox
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) 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.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG RESPONSE TO Q9 (FULL DOC ATTACHED TO Q46)</p> <p>Question 9</p> <p><i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <p>Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. □</p> <p>Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to the Stage 1 Green Belt Review</p> <p>http://www.berkhamstedactiongroup.com/wp-content/uploads/2014/05/BRAG-Analysis-of-the-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf</p>

	<p>Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.</p> <p>Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations</p> <p>Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.□</p> <p>The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”</p>
Include files	
Number	Question 9
ID	LPIO7227
Full Name	Mr Matthew Saul
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Building on greenbelt would destroy surrounding countryside of kings Langley and other surrounding villages. It would have a significant impact on the

	<p>environment, wildlife and irrecoverably damage the character of the village.</p> <p>Implementation of the proposed developments will blur the village boundaries. The character of kings Langley as a semi rural village will be lost. The surrounding countryside is an attractive and valued part of the village and is enjoyed by residents and visitors. It also provides a livelihood to those working on the farm land. Greenbelt land should not be considered for development and should be protected</p>
Include files	
Number	Question 9
ID	LPIO7278
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	I object to the plan which I believe: - fails to protect our green belt;
Include files	
Number	Question 9
ID	LPIO7310
Full Name	Brian and Heidi Norris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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 9 (please note full document is attached to Q46)</p> <p>Question 9</p> <p><i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <p><input type="checkbox"/></p>

Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.

Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.greenbeltanddirection.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).

Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.

Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations

Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.

The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of

	protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."
Include files	
Number	Question 9
ID	LPIO7354
Full Name	Carol Atkinson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q.9 Green Belt – No / Q.11 – Selecting Sites - No</p> <p>Any development on farmland and green belt should be a last resort because we are going to struggle to feed ourselves and avoid flooding and pollution with climate change.</p>
Include files	
Number	Question 9
ID	LPIO7368
Full Name	Mrs Helen Harding
Company / Organisation	Chiltern & South Bucks District Council
Position	Principal Planner
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>9 – Green Belt and Major Developed Sites</p> <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.</p> <p>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</p>

	<p>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 overall approach is consistent with that taken as part of the Chiltern and South Bucks Local Plan consultations and is welcomed. However the Councils will want to have close involvement in the potential future proposals for Bovingdon Prison (paragraph 5.2.9) in case there are infrastructure implications for areas close by in Chiltern District.</p> <p>Full document attached to Q46</p>
Include files	
Number	Question 9
ID	LPIO7378
Full Name	Mr Clive Birch
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants who have an underlying belief that current Green Belt policy is wrong.</p> <p>The Inspector's report [July 2013] states "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."</p>
Include files	
Number	Question 9
ID	LPIO7514
Full Name	Annette Harrison
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>My last question under this section is, "Is Dacorum fully justified in building on the Green Belt?" I would appreciate a detailed answer to this question to accompany a document I am sending to the Government.</p>

Include files	
Number	Question 9
ID	LPIO7520
Full Name	Paul Harrison
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	My last question under this section is, "Is Dacorum fully justified in building on the Green Belt?" I would appreciate a detailed answer to this question to accompany a document I am sending to the Government.
Include files	
Number	Question 9
ID	LPIO7552
Full Name	David Reavell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt should be afforded the highest possible level of protection to prevent an irredeemable change in the character of the District.
Include files	
Number	Question 9
ID	LPIO7561
Full Name	Fiona Reavell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt should be afforded the highest possible level of protection to prevent an irredeemable change in the character of the District.
Include files	

Number	Question 9
ID	LPIO7633
Full Name	Amy Lazzerini
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt land was never meant to be built on. That's the whole point of it. Please don't ruin our countryside without exhausting every single other option. You owe it to the people who have made KL their home and it's your job to preserve this area for future generations.
Include files	
Number	Question 9
ID	LPIO7674
Full Name	JUNE LIGHTFOOT
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No Green Belt should stay as a proper green belt otherwise our towns will merge into each other over time & the countryside which enhances everyone's lives will be lost.
Include files	
Number	Question 9
ID	LPIO7695
Full Name	MR & MRS MP & ME HARNETT
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<i>No . See response to Q3. [No. The Issues and Options paper and in particular the accompanying draft Schedule of Site Appraisals does not have proper regard to the Stage 2 Green Belt Review report prepared by Arup on behalf of the Council in 2016 and published in December 2016. As is explained in more detail below, the area of</i>

	<i>land at Shendish which Arup advised could potentially be released from its current Green Belt designation (subject to further investigation) is substantially smaller than the area shown as a potential site for future housing in the draft Schedule of Site Appraisals]</i>
Include files	
Number	Question 9
ID	LPIO7709
Full Name	KAREN PETERS-AMPHLETT
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 underlying factor to me is that you plan to build on Green Belt which I think is an absolute disgrace. You made and passed law that states that green belt cannot be built upon to prevent urban sprawl and also to protect areas of natural beauty. Please explain how all of a sudden it is ok for councils to not adhere by law? Does this mean that any laws passed no longer have to be adhered to? Should councils not be setting and example for others.</p> <p>I comprehend the need for new houses, I understand there is a need for 603 per year in Dacorum. Why oh why are 3,800 planned in one tiny village on GREEN BELT!!</p>
Include files	
Number	Question 9
ID	LPIO7851
Full Name	Dr Peter Chapman
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 9
ID	LPIO7891
Full Name	MR COLIN WHYMAN
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I AM TOTAL OPPOSITION OF BUILDING IN GREEN BELT LAND
Include files	
Number	Question 9
ID	LPIO7935
Full Name	Mr Norman Groves
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 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 Q9</p> <p>Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.</p> <p>Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG' full response to the Stage 1 Green Belt Review</p> <p>http://www.southhampton.gov.uk/portal/2014/06/BRAG%20Response%20to%20the%20Green%20Belt%20Review-undertaken-for-DBC-by-SKM-final-version.pdf</p> <p>Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.</p> <p>Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed –infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental –safeguard for future generations</p> <p>Major developed sites –should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a</p>

	<p>certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary –but failed to do.</p> <p>The Inspector’ report [July 2013] records “t must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’ main town.”</p>
Include files	
Number	Question 9
ID	LPIO7985
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>It ignores one of the fundamental functions of Green Belt: the prevention of urban sprawl and ribbon development by maintaining open areas between built up areas.</p> <p>Minimising the loss of Green Belt land to development must be a priority for the new Local Plan because this is a national Planning policy priority as restated recently by the Government. The proposed approach to Green Belt set out in paragraph 5.2.2 of the document, of trying to balance the two conflicting requirements; of planning for enough sustainable development to meet the future needs of Dacorum; and protecting the Green Belt from most types of development, is inappropriate because housing need alone is not an “exceptional circumstance” which would justify loss of Green Belt Land.</p> <p>Both the stages of the Green Belt Review are deeply flawed and DBC’s Green Belt Review , produced by consultants whose starting point – possibly deriving from their briefing by DBC, appears to be founded on an underlying belief that current Green Belt policy is wrong according to their own highly-selective set of definitions. The Green Belt Review should have been based on an assessment of which discrete parcels of already developed land can be taken out of Green</p>

	Belt to provide a stronger more coherent Green Belt boundary – but it failed to do this and in the case of one already-released site: LA1 (Marchmont Fields), for which DBC claimed to have established a “defensible edge to the Green Belt”, now suggests that the rest of the land area might as well be treated as a part of the urban area and thus is up for grabs.
Include files	
Number	Question 9
ID	LPIO8026
Full Name	A R MCVEY
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	why are Dacorum considering building on Greenbelt? I believe that the Greenbelt should have the highest level of statutory protection.
Include files	
Number	Question 9
ID	LPIO8027
Full Name	A R MCVEY
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	why are Dacorum considering building on Greenbelt? I believe that the Greenbelt should have the highest level of statutory protection.
Include files	
Number	Question 9
ID	LPIO8038
Full Name	MR P & MRS M EDNEY
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	The Green belt has always been out of contention for building in Dacorum, it was formed purely to protect our rural villages from becoming over developed and preserve a way of life for future generations as well as existing residents. It is totally unacceptable to build on this green belt land under any circumstances. Dacorum's villages are its jewel in its crown hence no development on green Belt land must remain a RED LINE.
Include files	
Number	Question 9
ID	LPIO8125
Full Name	MR PETER CRACKNELL
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt proposals especially are nonsensical. Green Belt was invented to preserve open spaces that soften the landscape and give residents of nearby areas the chance to enjoy a greener outlook in at least one direction. The need for such spaces is even more vital now than it was when there was so much less demand to turn green into brown.
Include files	
Number	Question 9
ID	LPIO8147
Full Name	MR WINSTON EDWARDS
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	1. Building on green belt land destroys the possibility of future generations benefiting from have nearby green areas. Green belts should be held in trust for future generations, not destroyed for today's expediencies.
Include files	
Number	Question 9
ID	LPIO8178
Full Name	Mr Tim Swann
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 want to air my strongest possible objection to any green belt land being re-assigned for proposed development</p> <p>The UK is already overpopulated by 50 million people when all factors relating to sustainability are considered</p> <p>Not only is nature in melt-down trying to provide for us all but we are also poisoning it and poisoning ourselves at an astounding rate</p> <p>We have to say no more population increase No more development that involves taking from nature</p> <p>The green belt was put in place to protect against development for future generations and it should remain for others to come</p> <p>There is already huge over-heating of the South East economy</p> <p>There are large areas of dereliction around the country that should be regenerated to ease the huge regional imbalance if we insist on a crazy open door immigration policy</p> <p>Please help save nature and our beautiful planet or in truth we humans will erupt in war then perish and it won't be very nice</p>
Include files	
Number	Question 9
ID	LPIO8186
Full Name	MS SOPHIE BODEN
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I significantly disagree with the decision to remove green belt land

Include files	
Number	Question 9
ID	LPIO8196
Full Name	MRS VALERIE LEE
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 totally opposed to the plans for new housing/developments in the village of Kings Langley. I have lived in the village for 35 years and am appalled that green belt sites are being considered.</p> <p>The green belt in this village has been protected and cared for by the local residents for many years. It is constantly in use by walkers, Duke of Edinburgh Award students are often seen walking through the village and walking within this area. It is a welcome sight to see such young people enjoying our countryside. Developing the green belt will have a serious impact on the local wildlife as well. What will our deer do if development is allowed, their natural habitat would disappear and leave them with no refuge whatsoever. These green belt sites have become our amenity spaces within the village.</p> <p>GREEN BELT LAND SHOULD REMAIN SACROSANCT, PREVENTING THE MERGER BETWEEN TOWNS AND VILLAGES. What is being proposed would join us to Watford on one side and Apsley and Hemel Hempstead on the other, destroying our village status. This country needs small villages, hamlets, they are all part of our history.</p> <p>We have a vibrant Village community in Kings Langley and we cherish our Green Belt Land:</p> <p>YOU CAN NEVER REPLACE GREEN BELT LAND, ONCE ITS GONE, ITS GONE FOREVER.</p> <p>These proposals are unrealistic, unsustainable and I urge the council to go back to the drawing board, or better still, leave your desk, computers and whatever and visit the village and see for yourselves that our village simply cannot take any more development.</p>
Include files	
Number	Question 9
ID	LPIO8206
Full Name	Mr Keith Ward
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 strongly of the view that green belt land should maintain its previous status, and recent changes in law are to my mind little short of scandalous. Councillors have an obligation to see themselves as custodians of this vital asset, not controllers or quasi-owners, and recognise that once gone it can never be returned to its previous state. You have a duty to protect future generations, and I include my own children in this, who are (at least currently) working hard to be able to remain here.</p> <p>And it seems that at least one lawmaker agrees. I observe that the NPPF defines 'checking the unrestricted sprawl of large built-up areas', 'prevention of neighbouring towns merging into one another', 'assisting in safeguarding the countryside from encroachment' and 'preserving the setting and special character of historic towns' as the first four of its five aims. The plans as currently set out clear breach all four, and the fifth – to 'encourage the recycling of derelict and other urban land' is also clearly being disregarded, as per my point above.</p> <p>Also, one of the most important green belt locational principles is mentioned nowhere in your document, namely that green belt land should be developed 'only for appropriate uses or where "exceptional circumstances" permit it'. What are these, and what is the justification?</p>
Include files	
Number	Question 9
ID	LPIO8216
Full Name	Mrs Suzanne Nixon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>WHERE TO BUILD</p> <p>Brownfield sites must have priority. The Greenbelt must be protected. It is an invaluable asset and should remain so for future generations. Current policy is to protect the Greenbelt and this must remain in place. It is important with regard to quality of life and for environmental reasons.</p>
Include files	
Number	Question 9
ID	LPIO8255
Full Name	Mrs Annushka Scruton

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 to object to all Green Belt Development in Kings Langley.</p> <p>Development in our village is going to create an urban sprawl which will diminish the character of Kings Langley. The people of Kings Langley are proud to live in a village and do not want to coalesce with neighbouring settlements.</p> <p>Our Greenbelt land is a cherished asset bringing social, environmental and economic benefits. The greenbelt land supports important wildlife and biodiversity resources, please do not jeopardise this whilst there are brownfield sites that can be utilised to achieve the governments housing targets.</p> <p>Option 1A) in the strategic plan is the only viable option for local development.</p>
Include files	
Number	Question 9
ID	LPIO8300
Full Name	Mr Derek Curtler
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I am opposed to building on the green belt.
Include files	
Number	Question 9
ID	LPIO8359
Full Name	MR T AMSDEN
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The plan would entail substantial incursion into Green Belt land. In my view, if you can't deliver the housing without using Green Belt land, that simply means that you can't deliver the housing, full stop.

	I am at a loss to understand how, if some Green Belt land were to be developed and its boundaries were redrawn, the designation could then be considered to have any meaning whatsoever. It was stressed several years ago by John Selwyn Gummer that Green Belt was to be considered permanent. If it is continuously eroded in this way, there will be none left; all its purposes will have been negated and the exercise will have failed. Settlements will have coalesced into each other and the characteristics of each settlement will have been lost.
Include files	
Number	Question 9
ID	LPIO8379
Full Name	Mrs Sarah Rees
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) 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.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p>

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/sites/default/files/2014/08/BRAG-Analysis-of-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
 - Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to
 - The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"

Include files	
Number	Question 9
ID	LPIO8394
Full Name	Helen & Stuart 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>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.</p> <p>However, we would like to take this opportunity to emphasize just a few of the most important points within that response</p> <p>DBC's green belt review needs to be re examined. The whole point of green belt is to ensure that there is a leash on developments as it is human nature to make as developers would obviously like to develop as much as possible on single sites - you only have to look at some of the 1970s monstrous architecture in the town, to realise that safeguards for the future need to be adhered to as bad mistakes aren't easily rectified later.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/sites/default/files/2014/08/BRAG%20to%20DBC%20-%20Green%20Belt%20Review%20undertaken%20for%20DBC%20by%20SKM%20-%20final%20version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with

	<p>developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to</p> <ul style="list-style-type: none"> • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main ”
Include files	
Number	Question 9
ID	LP108409
Full Name	Spencer 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>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> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p>

Question 9 Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/portal/2014/05/BRAGs%20Green%20Belt%20Review%20undertaken%20for%20DBC%20by%20SKM%20final%20version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
 - Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to
 - The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main "

Include files	
Number	Question 9
ID	LP108427

Full Name	Mr Peter Shell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhampton.gov.uk/2014/06/BRAG-Answers-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to • The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and

	therefore more weight should be attached to securing sustainable growth in the Borough's main town."
Include files	
Number	Question 9
ID	LPIO8472
Full Name	Mrs Pat Berkley
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) have responded in full to the 'Issues & 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.</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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/council/2010/08/20/BRAG%20Response%20to%20Green%20Belt%20Review-undertaken-for-DBC-by-SKM-final-version.pdf). • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting

	<p>point appears to be an underlying belief that current Green Belt policy is wrong.</p> <ul style="list-style-type: none"> • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main ”
Include files	
Number	Question 9
ID	LPIO8490
Full Name	Mr Lawrence Sutton
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 & 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>Q3 & Q9. DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point</p>

appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/portal/2010/08/BRAG-against-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main "

Include files	
Number	Question 9
ID	LP108633
Full Name	MERLE LIDDY

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	This is a no
Include files	
Number	Question 9
ID	LPIO8643
Full Name	MR PAUL REES
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 have been shocked and dismayed by the options set out in the Dacorum Council's document Local Plan - Issues and Options, as the options actually countenance building on green belt land.</p> <p>The green belt was introduced to prevent urban sprawl and the Chancellor Philip Hammond reiterated at the time of the Budget, that he would not lift green belt protection</p> <p>The de-designation of green belt land would fatally undermine any credibility that Dacorum Council might have in terms of protecting the nature of character of the local rural and built environment.</p> <p>I believe that Dacorum should ideally push back on government demands for more housing, as the rate of development envisaged across the country simply is not sustainable, given that according to scientists we have now entered the Earth's Sixth Mass Extinction. Therefore, the adoption of a sustainable policy is critical.</p>
Include files	
Number	Question 9
ID	LPIO8652
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	No 1- Need to make compulsory the development of brownfield sites. Perhaps make it a condition for developers of large sites to develop some brownfield areas as well. 2- The density of housing should be concentrated in Hemel Hempstead, not in areas where it would change their character for ever. 3- Have not take due account of Green Belt reviews by Planning Inspectors nor the recent report by the Chilterns Conservation Board.
Include files	
Number	Question 9
ID	LPIO8654
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	No 4- There should not be any additional sites in the Green Belt – there have been enough already. If areas of the Green Belt do not meet the criteria (where are these and in what way do they not meet the criteria?) this should be remedied if possible, or if this is not possible and they lose their status, other greenfield land should be designated in lieu. 5- There are no exceptional circumstances to justify use of Green Belt land. Housing need is not an exceptional circumstance. 6- Demand is not the same as need. Developers proposing sites in the Green Belt is not led by need. 7- Loss of Green Belt land would be to the detriment of all residents. The only people to benefit would be the developers. 8- If you allow Green Belt land to be considered for development, developers will put in lots of planning applications on Green Belt land, resulting in lengthy applications, appeals, etc. Avoid all this by simplifying the issue. State categorically that there will be no development in the Green Belt.
Include files	
Number	Question 9
ID	LPIO8697
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	Releasing development sites from the Green Belt will result in unacceptable urban sprawl
Include files	
Number	Question 9
ID	LPIO8758
Full Name	richard durnford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I strongly object to any development of greenbelt land in the borough and particularly at Shendish. We moved to Shendish with a young family last year and consider that this unique and historic area would be ruined by the development under consideration. There are numerous important practical and environmental reasons why greenbelt at Shendish and the rest of Kings Langley should not be used for development, including inadequate infrastructure, road access, and adding to congestion and pollution (I understand that pollution in Apsley already exceeds guidelines), moreover the irreversible loss of this greenbelt land and the coalescence of Kings Langley into Hemel Hempstead must be avoided.
Include files	
Number	Question 9
ID	LPIO8763
Full Name	gregory lee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Specifically regarding the potential of additional housing on the Shendish area I feel would considerably impact my quality of life in Kings Langley. The rural aspect that the green belt provides has given untold amounts of pleasure to my family over the years. The wildlife in the area is still a constant reminder of why we moved to the specific area of the village and any plans to build houses on this would have a massive impact. I feel the same

	also with regards to all other green belt areas of the village that housing is being considered for. In my opinion the green belt areas are all extremely important to the make up of the village and mass housing projects would significantly unbalance our community. My suggestion is that all green belt land should remain so and additional housing sites and solutions should be sought outside of the green belt.
Include files	
Number	Question 9
ID	LPIO8850
Full Name	MR CHRISTOPHER PETTIT
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	2. Any new development on Green Belt land in or around Kings Langley could destroy the character of the village. It has taken 700 years to create this village, please don't ruin it now.
Include files	
Number	Question 9
ID	LPIO8955
Full Name	barney greenwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt is Green Belt, not Development Belt.
Include files	
Number	Question 9
ID	LPIO8983
Full Name	David Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No

	This approach ignores the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
Include files	
Number	Question 9
ID	LPIO9004
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	This approach ignores the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
Include files	
Number	Question 9
ID	LPIO9112
Full Name	Antonio Afonso
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Building on green belt should only ever be a last resort, and is not something that is actively supported by the government. With numerous brownfield sites outlined and other sites with better potential for improved infrastructure and services, destroying the character of one of West Hertfordshire's most loved villages should simply not be on the cards. Building at this scale around Tring, Hemel Hempstead and Berkhamsted, which are already larger towns with existing infrastructure and the capacity to support many more homes, would be the more sensible choice - destruction of beautiful green belt land, including one of only two working dairy farms in the county.
Include files	
Number	Question 9
ID	LPIO9118

Full Name	Claire Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I support building in brownfield sites, I support getting unused homes back into use, but I don't support ANY building on green belt
Include files	
Number	Question 9
ID	LPIO9128
Full Name	Mark Durman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><u>Green belt development</u></p> <p>Under the plan up to 450 houses involves the taking of green belt land. This clearly conflicts with Dacorum's core strategy to ' minimise impact on Green Belt' The taking of green belt land should not be considered just because it has been offered which appears to be the case. It should only be considered when brownfield land within the borough has been exhausted</p> <p>Preferred option from the plan</p> <p>The combination of loss of green belt land, limitations of infrastructure, and community services at or near capacity means that the village cannot support additional housing beyond the 90 or so already agreed in previous plans and yet to be built. To contemplate up to 450 houses would require a large investment in infrastructure and would have a negative impact on the quality of life in a village community already close to capacity. For that reason I would only support option 2b which provides the housing required by the area but sites them where the transport infrastructure is available and close to the opportunities for work, schooling and other essential services. Siting housing close to where most members of the household need to travel to on a daily basis makes sense in terms of carbon footprint, quality of life and convenience.</p>
Include files	
Number	Question 9
ID	LPIO9135

Full Name	MRS DIANA FRY
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	One final thing that really concerns me is that Green Belt sites are even being considered. I believed them to be areas protected by law. Has the law been changed, or is it being manipulated? Are developers not to be held accountable for building on such sites?
Include files	
Number	Question 9
ID	LPIO9139
Full Name	jane and noel lynch
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 to lodge my objection to the removal of Green Belt land in Berkhamstead for construction of yet more homes. Berkhamstead is a small town already under enormous pressure for amenities and overrun with vehicles causing constant traffic and parking problems. More homes would only increase these problems and cause the loss of the character of the town. There surely must be a point where the charm of a traditional market town such as ours is ruined. To take Green Belt land with insufficient infrastructure would be an absolute disaster and it is outrageous that large amounts of Green Belt land will disappear all for the greed of developers.</p> <p>From a personal point of view, we live in Heron Place, Bank Mill. At the far end of our development is a piece of Green Belt land known as The Meadow. This land is adjacent to the canal and is home to a large number of wildlife including various birds, water birds, mammals and bats. Also this area is the only piece of natural land sloping down to the canal. We understand it has been offered for removal of Green Belt for the purpose of building on, which we would strongly oppose. Another cause for great concern would be the access to the land through the only entrance accessed via the small bridge over the canal or Bank Mill, both areas being unsuitable for heavy construction vehicles. This will not be a worry if it stays within Green Belt.</p> <p>For all the reasons stated we strongly object to removal of Green Belt land in Berkhamstead.</p>

Include files	
Number	Question 9
ID	LPIO9157
Full Name	S Langley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Q3 & Q9. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.
Include files	
Number	Question 9
ID	LPIO9182
Full Name	Alexandra Forbes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I write to object the proposed green belt development plans in the Kings Langley and surrounding areas
Include files	
Number	Question 9
ID	LPIO9253
Full Name	Neil Francis
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	To whom it may concern, My family and I live in Kings Langley. We are dismayed at the amount of proposed housing developments that

	will take away the countryside that helps to make our little town what it is and are vigorously opposed to any such developments. The government supports the development of brownfield sites, not green belt land which I fully support the redevelopment of; sensible, not damaging to the environment and in keeping with the 'strong protection of our green belt' as suggested by the Chancellor in his Autumn Statement
Include files	
Number	Question 9
ID	LPIO9258
Full Name	Neil Francis
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	So our request is simple....aim for the brownfield sites that our national government is suggesting, not the precious green belt land that seems to be an easy target, but which would have a devastating impact as to the local area and the people living in it.
Include files	
Number	Question 9
ID	LPIO9274
Full Name	barry & patricia groves
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Before we make any comments we would refer you to recent statements made by Theresa May, Philip Hammond and Sadiq Khan who have all stated in the public domain that the Green Belt will not be built on. Many of the sites in your Local Plan would require the need to develop the Green Belt. If your intention would be to take certain parcels of land out of the Green Belt, thus allowing these parcels to be developed for housing and still conforming to the named politicians statements, this is devious and at the very least immoral.
Include files	
Number	Question 9
ID	LPIO9279

Full Name	LUCY CHURCH
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 in regards to the proposed planning to build on four green belt locations in Bovingdon.</p> <p>Bovingdon is a village and the green belt is a designated conservation area, by building on the green belt you remove the aesthetic look of the village and destroy it's natural beauty.</p> <p>I hope that you take these points into consideration and reinvest your building planning to another location that does not ruin the green belt. I hope to hear a response soon</p>
Include files	
Number	Question 9
ID	LPIO9285
Full Name	PAUL SAUNDERS
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 suggested expansion to Greenbelt is not appropriate for the area. The additions of Nash Mills Wharf, The Ovaltine and Apsley Wharf, as well as the development West of Apsley station have created near gridlock and capacity for the rural area has been reached.</p>
Include files	
Number	Question 9
ID	LPIO9294
Full Name	RICHARD DURNFORD
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 strongly object to any development of greenbelt land in the borough and particularly at Shendish. We moved to Shendish with a young family last year and consider that this unique and historic area would be ruined by the</p>

	<p>development under consideration. There are numerous important practical and environmental reasons why greenbelt at Shendish and the rest of Kings Langley should not be used for development, including inadequate infrastructure, road access, and adding to congestion and pollution (I understand that pollution in Apsley already exceeds guidelines), moreover the irreversible loss of this greenbelt land and the coalescence of Kings Langley into Hemel Hempstead must be avoided.</p>
Include files	

Number	Question 9
ID	LPIO9335
Full Name	PIP MALLOY
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	5) Green belt, is it really all right to keep taking away our green belt?
Include files	
Number	Question 9
ID	LPIO9373
Full Name	Ms Julie Steer
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I do not support any development in the Green Belt. As a village we fought the siting of a traveller site on Green belt on Hempstead Road, why would we now accept housing on Green Belt. DBCs core strategy is to minimise the impact on Green Belt and safeguard the countryside – the proposed developments of a possible 4 Green Belt sites would blow this policy out of the water. Development should be on brownfield sites first before green belt is even considered whether offered up by landowners or not !!.
Include files	
Number	Question 9
ID	LPIO9523
Full Name	Ted Carroll
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I feel building on Greenfield land should be a “red line” – at this time of Brexit, we need food security and it will not be achieved if we build on greenbelt, agricultural land

	<p>I had very strong concerns when I read this statement:</p> <p>“In 2014 and 2015 we asked developers and landowners to let us have details of sites that they felt were suitable for a range of developments, including housing, through a “call for sites” exercise. Information on additional sites is still coming forward. The majority of land promoted through this process was large sites in the Green Belt.”</p> <p>It is clearly in the interest of these groups (Landowners, Housing Developers) to sell and build on green belt land – why not let residents have a stronger voice. Developers are likely to put forward green belt sites in preference to brownfield sites “held in reserve”.</p> <p>I feel we should be exploring:</p> <ul style="list-style-type: none"> • higher density housing in small towns and larger towns such as Hemel Hempstead • more affordable and starter homes – and less executive homes build on the green belt • homes with good transport links and less than half a mile from stations or good bus services. <p>Dacorum is a great place to live – there is an opportunity to be bold and modern thinking about housing provision and transport links. – this plan is presenting old thinking</p>
Include files	
Number	Question 9
ID	LPIO9527
Full Name	Sarah Wragg
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	. My biggest issue is the use of greenbelt land. I am sure that there are enough brownfield sites in our part of Hertfordshire that could be developed before you take away green space that we will never get back
Include files	
Number	Question 9
ID	LPIO9561
Full Name	Kevin Allen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	2. Green Belt was introduced for a purpose and it preserves boundaries between towns and villages. Erosion of this important buffer will just open the floodgates for more and more housing and destroy the character of the area.
Include files	
Number	Question 9
ID	LPIO9573
Full Name	IAN ORMISTON
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	What I most object to is the violation of the Green Belt. This is our heritage.
Include files	
Number	Question 9
ID	LPIO9580
Full Name	Stephen Watkins
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 wish to make the following comments regarding the Local Plan Issues and Options November 2017 Document / Consultation.</p> <p>ALL THE PROPOSED SITES ARE IN GREEN BELT WHICH SURROUNDS BOVINGDON</p> <p>I do not believe that the Government has changed the Green Belt Policy, and I quote:-</p> <p>“The National Planning Policy Framework is explicit that key protections like the Green Belt cannot be overridden by the presumption in favour of sustainable development. Green Belt boundaries should only be altered by local authorities where there is exceptional need. Guidance explains that unmet housing need does not equate to exceptional need.</p> <p>The Framework also guarantees strong protection for National Parks, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. It maintains the protections in place for ancient woodlands and exceptional dwellings in the countryside. New powers have also been given to councils to resist unwanted garden grabbing and to protect valuable local green spaces.”</p>

Include files	
Number	Question 9
ID	LPIO9617
Full Name	Mrs Lucy McRae
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I do understand that more housing is required in this area and across the country, but please consider brownfield options before building on our beautiful greenbelt areas and permanently ruining them for now and our future generations.
Include files	
Number	Question 9
ID	LPIO9625
Full Name	dr kim goode
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Just in case my comments on the site don't come through, can I make it clear that I am totally opposed to building on greenbelt land. Alternatives must be found.</p> <p>The need for housing could be reviewed; exploration of underused houses [there are a row of four, four bedroomed houses in Kings Langley with one elderly resident in each house]; more energy put into finding unused buildings and brownfield locations.</p> <p>Building on greenbelt could be reviewed case by case, but in principle there is no argument for a change in policy.</p>
Include files	
Number	Question 9
ID	LPIO9677
Full Name	Mr Luke Geoghegan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It sacrifices green belt land
Include files	
Number	Question 9
ID	LPIO9695
Full Name	Christine Riefa
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 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"> • green belt land is only allocated for development where guaranteed more than genuinely affordable housing (and at least of that to be social housing) • increased provision of sheltered and extra care housing for older residents • increased provision of 1 and 2 bedroom flats for younger residents • commitment to a thorough assessment of the infrastructure needs of each community and active planning to meet those needs ahead of further development <p>all future development to be subject to strict environmental and sustainability standards, including limiting traffic growth and enhancing road safety</p>
Include files	
Number	Question 9
ID	LPIO9701
Full Name	Mr Garry Lilburn
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 would like to register my objections to the strategic plans of building on any green belt areas within Dacorum. If building is necessary it should only be confined to the towns and should not lead to villages being increased in size.</p>
Include files	
Number	Question 9

ID	LPIO9709
Full Name	Mrs Caroline Williams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The green belt is meant to protect some of the urban sprawl, if you build on the farms you have identified - where will the gap between Watford and Hemel be? Ironically probably the Hertfordshire County Council offices in Shendish! I suspect Apsley as people know it would also disappear.
Include files	
Number	Question 9
ID	LPIO9734
Full Name	Brendon Sparks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<u>Green Belt</u> The DBC Green Belt Plan is flawed. Any adjustments in Green Belt should have been completed before considering planned new sites. The consultants/DBC have ignored current policy to protect Green Belt. Even accepting some requirements may need adjustment the scale indicated in your plans ignore both intentions and policy to protect Green Belt. Brown Field sites must have priority. DBC has in fairness has utilised this option in Hemel Hempstead. There remain further sites that can be developed.
Include files	
Number	Question 9
ID	LPIO9754
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

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, 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.

Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southoxford.gov.uk/2016/06/20/BRAG-Response-to-Stage-1-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from

	<p>Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.</p> <ul style="list-style-type: none"> • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LP109802
Full Name	Mr Paul Wardle
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 & 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>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to the Stage 1 Green Belt Review

	We do have concerns with a number of developments due to the huge amount of green belt that seems to be under threat along with ancient woodlands being encompassed and priority habitat hedgerows that could be impacted, particularly in the area North of Hemel. As stated in the scoping report, it is important to have habitat connectivity and a protection of bio diversity and we are particularly concerned that certain developments would totally isolate certain areas of bio diversity/wildlife such as HH-h1a and HH-h1b.
Include files	
Number	Question 9
ID	LPIO9852
Full Name	Mrs A. Wilkins
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 any building on green belt land. I am a resident of Kings Langley and therefore am objecting about building in this parish.</p> <p>I am not a N.I.M.B.E. I think greenbelt land is important to all, where ever it is.</p> <p>Please use Brownfield sites at all times for building.</p> <p>We will never get the greenbelt back if it is built on. Global warming relies on trees, the bees rely on plants on the green belt, we need bees for our crops (food).</p> <p>This is so important <u>Do Not Build On the Greenbelt</u></p>
Include files	
Number	Question 9
ID	LPIO9853
Full Name	Mazie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Apologies this is late, but I wanted to let you know i object to the planning suggestion to use some of the greenbelt area in the Kings Langley</p> <p>Hope my objection will be acknowledged.</p> <p>I look forward to hearing from you.</p>
Include files	

Number	Question 9
ID	LPIO9877
Full Name	David and Elizabeth Harris
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 see my objections and comments below to the plans for the development of 90 + 360 new homes in Bovingdon.</p> <p><u>Greenbelt:</u></p> <p>Once areas of the green belt are gone, they're gone forever.</p> <p>An impact on soil, water soakaway, erosion. There will be a heavy impact on all the local flora and fauna which is very rich. This will be heavily impacted. Pollution will increase with the introduction of new cars, and at the same time you will be removing flora which helps reduce it.</p> <p>Everyone appreciates that we need to build more homes but with the current situation, if even 9 new homes are built, the village wouldn't manage. So, if we agree to 90 the floodgates will open for more, so whilst I agree we need to build and improve local facilities, I can't agree to any building at the moment given the current local environment.</p>
Include files	
Number	Question 9
ID	LPIO9901
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	<p>Brownbelt Sites – With the current economic climate, there are more and more Brownbelt sites becoming vacant. When I drive through the Maylands Avenue industrial area there are a number of vacant sites. I recently drove towards Hemel Hempstead train station and just beyond Aldi, there are vacant buildings. There are retail outlets becoming vacant all of the time as the high streets continue (and will continue to) struggle with the threat from e-Commerce. When there are so many Brownbelt sites which could be developed to meet the</p>

	housing shortage, why do we need to build on greenbelt land? The Ovaltine development worked very well and a potential site for further development is Bovingdon aerodrome which already has the transport links. I urge you again to please re-consider the Greenbelt sites and take a longer term view of the impact
Include files	
Number	Question 9
ID	LPIO9904
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	Office Development On Greenbelt Land – I understand part of the development on the greenbelt sites is for offices and I assume this is to support the Government's National Planning Policy Framework to "Support development which encourages economic growth and the creation of sustainable communities." I fail to see how the building of offices on Greenbelt land supports this. There are a lot of vacant offices in Dacorum and the surrounding area so adding more vacant buildings to replace Greenbelt land does not support economic growth. Businesses are struggling to move to this area because the transportation infrastructure is not adequate to sustain a consistent workforce. Surely a better, longer term plan is to utilise vacant properties rather than developing Greenbelt land
Include files	
Number	Question 9
ID	LPIO9907
Full Name	REBECCA STERLING
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I believe that there should be no development on greenbelt areas.
Include files	
Number	Question 9
ID	LPIO9922
Full Name	Mr Richard Sidwell

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>When I was a child and became aware of the ever expanding city of London, I realised that many wonderful villages over time had been swallowed in its relentless march outwards. Highgate, Hampstead, East Barnet, Harrow, Barnes, Greenwich, to name but a few. Then in a school geography lesson one day I learnt about the Green Belt. WOW, what an extraordinary idea and what a great protection for our countryside, nature and open spaces.</p> <p>As I got older I used to then drive through a green belt of land from London to the M25 & always smiled at the vision & forward thinking of this ideal. A place for people to breathe away from the urban sprawl, to exercise for their wellbeing both physically & mentally, a green corridor & space for nature & wildlife to cling to the city edge which without, our world will come tumbling down.</p> <p>So, when I learn that Dacorum are even considering destroying Green Belt, I was totally gobsmacked. This land is sacrosanct, this land is untouchable, this land protects us from ever encroaching urbanisation and coalescence, and this land belongs to us, the people. The clear message is we DO NOT want our green belt touched, built over, destroyed by our council. It MUST be protected at all cost. I am aware of the need for more housing, but every single square inch of brownfield & infill land must be used first, and there is plenty of it in Dacorum.</p>
Include files	
Number	Question 9
ID	LP109955
Full Name	JAMES BURWELL
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I feel strongly that Brownfield sites should be used before Green Belt land, and building developments in Hertfordshire should be restricted to areas where there is the space and access to make them viable within existing communities. This is not the case in Kings Langley or Shendish. If building is necessary, I would prefer Options 1A or 1C which would not include building

	on land at Shendish, prioritising the preservation of the Green Belt land we value so highly
Include files	
Number	Question 9
ID	LPIO9977
Full Name	mr Kevin Smith
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 & 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>Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/sites/default/files/2016/04/BRAG-Analysis-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants

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Include files	
Number	Question 9
ID	LPIO10025
Full Name	Jill Mewha
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 & 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>Q3 & Q9. DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before</p>

considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

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Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

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 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
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	the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."
Include files	
Number	Question 9
ID	LPIO10094
Full Name	Melanie Frankel
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 & 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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/portal/2014/08/20/BRAG-Analysis-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf).

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Include files	
Number	Question 9
ID	LPIO10142
Full Name	Natalie Crane
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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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Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

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 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
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Include files	
Number	Question 9
ID	LPIO10199
Full Name	Mr Tim Beeby
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 & 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>Q3 & Q9. DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in

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Include files	
Number	Question 9
ID	LPIO10246
Full Name	John and Jane Beeley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

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Include files	
Number	Question 9
ID	LPIO10296
Full Name	Kathleen Lally
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 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>. I agree entirely with the BRAG response to your plan.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to the Stage 1 Green Belt Review

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Include files	
Number	Question 9
ID	LPIO10390
Full Name	Ben Stutman
Company / Organisation	Buckinghamshire County Council
Position	Growth & Strategy Graduate Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>BCC value and respect the unique quality of the Buckinghamshire Green Belt and will continue to resist inappropriate development in the Green Belt. The preservation and maintenance of the Green Belt is a strategic objective of the County Council. BCC would like to see the Green Belt protected in accordance with the National Planning Policy Framework and relevant guidance notes.</p>
Include files	
Number	Question 9
ID	LPIO10410
Full Name	Mr Daniel Parry
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 & 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>

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DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/portal/2016/04/20/BRAG-Stage-1-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
 - Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green

	<p>Belt to provide a stronger more coherent Green Belt boundary – but failed to</p> <ul style="list-style-type: none"> The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO10459
Full Name	David 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>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, <u>I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name</u></p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should

be large and self-supporting - perhaps revisit village

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Include files	
Number	Question 9
ID	LPIO10509
Full Name	Mr Stephen Doughty
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 & 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>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southherts.gov.uk/consultations/2014/BRAG%20Green%20Belt%20Review%20undertaken%20for%20DBC%20by%20SKM%20final%20version.pdf). <ul style="list-style-type: none"> • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to • The Inspector's report [July 2013] records "it must be remembered that many of these

	settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."
Include files	
Number	Question 9
ID	LPIO10557
Full Name	Mr Roger Petts
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) 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> <p>...</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.suffolk.gov.uk/sites/default/files/2016/06/BRAG%20stage%201%20Green%20Belt%20Review-undertaken-for-DBC-by-SKM-final-version.pdf). Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial.

	<p>Consideration of impact on character of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO10604
Full Name	Simon Chilton
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 & 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>DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being</p>

arbitrarily lumped in with developed sites regardless of ownership of the land.

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Include files

Number	Question 9
ID	LPIO10654
Full Name	Sally and David Williams
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 as support for BRAG's submission.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southants.gov.uk/sites/default/files/2016/04/BRAG%20Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green

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Include files	
Number	Question 9
ID	LPIO10702
Full Name	Mrs Jenny Jenkins
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) 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> <p>However, I would like to emphasise a few of the most important points within that response that I strongly agree with:</p> <p>DBC’s Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p>

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Include files	
Number	Question 9
ID	LPIO10750
Full Name	Taylor Wimpy Strategic Land
Company / Organisation	Taylor Wimpy Strategic Land
Position	C/O Pegasus Group

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>It is difficult to answer this question as the proposed approach is not clear. It is fair to say that the Council is looking at many of the key issues in respect of Green Belt releases and is clearly contemplating Green Belt releases, which is welcomed. However, the Issues and Options paper does not yet set out any definitive approach to Green Belt sites.</p> <p>Paragraph 5.2.1 explains that the Council must demonstrate 'exceptional circumstances' in order to justify Green Belt release, as set out at paragraph 83 of the Framework. In the case of Dacorum, it is very clear that exceptional circumstances do exist to justify the release of Green Belt land.</p> <p>As discussed elsewhere in these representations, the need to deliver new homes in Dacorum, both open market and affordable, is acute. Dacorum has, in the past, accommodated much of its development needs on brownfield sites (circa 84%), however as sites are redeveloped the availability of brownfield sites reduces over time. The Council currently estimates that it could deliver 476 dwellings per annum on urban sites, however this falls far short of meeting identified needs which could be 1,000 to 1,100 dwellings per annum in line with the standardised housing methodology. In this context the housing needs of the Borough cannot realistically be met without requiring development on greenfield land.</p> <p>The opportunities to meet housing need on greenfield sites outside the Green Belt are limited. As noted at paragraph 5.3.1, much of the Borough is designated Green Belt and those locations which are outside the Green Belt fall either within the Chilterns Area of Outstanding Natural Beauty, or are relatively distant from the higher-order settlements in the Borough with poor access to services. The most sustainable locations for growth in Dacorum are therefore most likely to be within the Green Belt – these include the towns such as Berkhamsted and large villages such as Bovingdon. It is pertinent to note that paragraph 84 of the Framework requires Green Belt boundaries to be drawn having regard to the need to achieve sustainable development; if land within the Green Belt is to be released, it should naturally be directed to sustainable settlements in Dacorum Borough.</p> <p>There is the potential to reapportion growth to other neighbouring local authorities under the Duty to Cooperate. However, many of Dacorum's neighbouring authorities are also facing significant increases in housing need and are also constrained by Green Belt. As such, there is no obvious neighbouring authority</p>

	<p>which would have the capacity (or even the political will) to accommodate any unmet need from Dacorum.</p> <p>Drawing the above together, it becomes apparent that the most sustainable and realistic means of addressing Dacorum's significant housing needs will require the release of Green Belt land. Failure to do so would result in housing need potentially being left unmet with no obvious opportunity to direct that need to neighbouring authorities or sites outside the Green Belt. As such, exceptional circumstances exist to justify the release of Green Belt land through the new Local Plan. It is necessary for the Local Plan to expressly set out this approach.</p> <p>For full response please see question 46.</p>
Include files	
Number	Question 9
ID	LPIO10774
Full Name	Mrs J Marshall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	more green belt should be used to enable spacious development rather than have developments crammed into small areas
Include files	
Number	Question 9
ID	LPIO10794
Full Name	Grant Imlah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>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.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous</p>

conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

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Include files	
Number	Question 9
ID	LPIO10847
Full Name	Sheila Dawkins
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 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 & 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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to

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<http://www.southants.gov.uk/sites/default/files/2014/08/2014-08-20-Stage-1-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>.

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Include files	
Number	Question 9
ID	LPIO10896
Full Name	Jean Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	DBC’s Green Belt review is flawed. Any adjustments in Green Belt should have been completed before

	considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored. The Consultants starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.
Include files	
Number	Question 9
ID	LPIO10945
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 & 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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to

	<p>the Stage 1 Green Belt Review http://www.southcambridgeshire.gov.uk/2014/08/20/BRAG-Analysis-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf.</p> <ul style="list-style-type: none"> • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO10995
Full Name	Mrs Patti Whittle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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.

Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/portal/2016/04/20/BRAG-Stage-1-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
 - Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been -

	<p>assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to</p> <ul style="list-style-type: none"> • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO11042
Full Name	J M Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	DBC’s Green Belt review is flawed. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored. The Consultants starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.
Include files	
Number	Question 9
ID	LPIO11094
Full Name	Denis Maclure
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt is Green Belt, not Development Belt.
Include files	
Number	Question 9
ID	LPIO11123
Full Name	Cally Emmas

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"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting – perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to the Stage 1 Green Belt Review https://www.southcambridgeshire.gov.uk/Document/24072013/Stage%201%20Green%20Belt%20Review%20Final%20Report%20-%202013.pdf • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been – assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	BRAG Analysis of the Green Belt Review undertaken for DBC by SKM final version (1)
Number	Question 9
ID	LPIO11170
Full Name	Mr Neil Aitchison
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The present reports and consideration are inadequate.
Include files	
Number	Question 9
ID	LPIO11216
Full Name	Jon Rollit
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 & 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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review

	<p>(http://www.southants.gov.uk/consultations/2014/BRAG-Analysis-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf).</p> <ul style="list-style-type: none"> • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO11267
Full Name	Kate Locke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In addition I would reiterate the extensive points made in the BRAG response to the ‘Issues & Options’ consultation. I request you accept this as confirmation

	<p>assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to</p> <ul style="list-style-type: none"> • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO11325
Full Name	David Greenwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Government guidance is that Green Belt land should be protected unless there are ‘exceptional circumstances’. However, because land owners have offered land for development, these are deemed to be exceptional enough circumstance to reclassify the land. While in close proximity are both Bovingdon airfield and Bovingdon Brickworks (partially disused), which are being ignored!
Include files	
Number	Question 9
ID	LPIO11355
Full Name	Ms Lorraine Gilmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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.

DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/portal/2014/04/BRAGs%20Green%20Belt%20Review%20undertaken%20for%20DBC%20by%20SKM%20final%20version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been -

	<p>assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to</p> <ul style="list-style-type: none"> • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO11404
Full Name	Conian
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 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 & 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>NO</p> <p>DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p><i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should

be large and self-supporting - perhaps revisit village

- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/sites/default/files/2014/04/BRAG-Analysis-of-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"

Include files	
Number	Question 9
ID	LPIO11448
Full Name	Mr & Mrs J Neale
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 long term view (5.2.2) is based on growth at current forecast figures; nationally they assume far greater growth in London and the counties surrounding London than in the Midlands, the North or the South West. Long term this may not be sustainable, let alone desirable. Once the Green Belt has been built on it will be gone, and with it the opportunities to grow food and support nature conservation.</p> <p>Government guidance on protecting the Green Belt (https://www.gov.uk/guidance/development-framework-protecting-green-belt) detailed exceptions to building in the Green Belt in para 89. The only possible exception relating to the developments in Kings Langley is “limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan”. Building housing on KL-h1 (Hill Farm) or KL-h3 (Wayside Farm), being on the fringes of Kings Langley is not infilling, it is expansion. There is no indication that all the housing at these sites meets the criterion of limited affordable housing for local community needs. Therefore, these sites meet the Government’s criteria and should not have their Green Belt designation removed (5.2.4 refers).</p> <p>Para 1.37 of the White Paper “Fixing our broken housing market” 7 Feb 2017 regarding the Green Belt said that however parts of it are not he green fields we often picture. The fields at Hill Farm are the green fields we picture.</p> <p>Recent statements by Sajid Javid (22 Oct 17), Theresa May (15 Nov 17) and Phillip Hammond (22 Nov 17) have all emphasised their strong protection for the Green Belt. There is an expectation that their words will have meaning locally.</p>
Include files	
Number	Question 9
ID	LPIO11478
Full Name	Mr Alan Ledger
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Releasing development sites from the Green Belt will result in unacceptable urban sprawl.
Include files	
Number	Question 9
ID	LPIO11514
Full Name	Ms Eliza Hermann

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Given that 82.2 hectares of land have just been removed from the Green Belt via the six Local Allocations in the 2006-2031 Core Strategy and this green space has now been lost forever, the new Local Plan needs to prioritise protection of Dacorum's remaining Green Belt. Instead this consultation and its supporting documents (e.g. Sustainability Working Note, Schedule of Site Appraisals) seem to take the notion of Green Belt as an elastic, impermanent concept, rather than affording it the enduring protection to prevent development sprawl that was intended when the Green Belt was first designated. The protection of the Green Belt is reinforced in the National Planning Policy Framework but this consultation doesn't make mention of this. The protection of the Green Belt has also been repeatedly restated by the government. Within the last month the Prime Minister "ruled out building on the Green Belt" and the Chancellor of the Exchequer in his Budget Speech made no change to Green Belt policy. This policy was stated in writing to all Members of Parliament by the then Housing Minister Brandon Lewis in July 2016 when he wrote "We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries."</p> <p>I accept that Green Belt boundaries can be changed in exceptional circumstances when supported by local people as part of the local planning process. I want to make it clear that I am a local person and I do not support any further changing of the Green Belt boundaries in Dacorum. This means the current town and village boundaries should be maintained, not changed, and that the Green Belt sites identified in this consultation should not be taken forward for development.</p>
Include files	
Number	Question 9
ID	LPIO11565
Full Name	Ms Anna Barnard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The National Planning Policy Framework (NPPF) has a general presumption against development in the Green Belt except for exceptional circumstances. Dacorum

appears to be disregarding this and taking the perverse view that it is acceptable to allow vast areas of the Green Belt land to be used for development – either directly for housing or for the required infrastructure. No exceptional circumstances have been proved and therefore no further land should be taken out of the Green Belt. Neither has it proved that there are no alternatives to building on the Green Belt eg. brownfield sites or higher density within the towns

- 1 One of the functions of the Green Belt is *'to assist in safeguarding the countryside from encroachment'*. By taking land out of the Green Belt the Council is allowing development in the countryside with *'no checking the unrestricted sprawl of large built up areas'*, another function of the Green Belt. This will be especially damaging to the setting of the Chilterns Area of Outstanding Natural Beauty by the proposed developments around Berkhamsted and Tring. The Countryside and Rights of Way Act 2000 Sn 85 requires local authorities *'to be mindful of both the positive and negative impacts of a development within the setting of the AONB on the natural beauty and special qualities of the AONB when determining planning applications'*. Not only will the visual impact of large scale development and the increased proximity of urban development be damaging to the setting of the AONB, its impact to the AONB itself will be felt by increased traffic, noise, pollution and general disturbance and loss of habitat of wildlife.

The so called 'Suitable Alternative Natural Greenspaces' (SANG) are no such thing. The existing Green Belt fulfils the 5 functions of the Green Belt as set out in the NPPF and there has been no replacement of the Green Belt already lost through the existing Core Strategy. Therefore, there is some doubt as to whether further loss will be replaced by suitable land which fulfils the 5 functions of the Green Belt. Man-made green space within developed areas cannot replace open natural countryside which is vital for agriculture and wildlife

Since the start of the consultation period for this plan both the Government and the Mayor of London have publically supported the protection of the Green Belt nationally and around London which is described as *'London's lung'*. The Green Belt in the Home Counties including Hertfordshire is an important contribution to this. Therefore, Dacorum is premature in seeking to release further Green Belt land for housing when this is not statutory Government policy nor can it be described as fulfilling the 'exceptional criteria' stated in NPPF.

Include files	
Number	Question 9
ID	LPIO11593
Full Name	Janet and James Honour
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 & 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>Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/portal/2014/08/BRAG%20-%20Green%20Belt%20Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character

	<p>of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO11645
Full Name	john and barbara neale
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 long term view (5.2.2) is based on growth at current forecast figures; nationally they assume far greater growth in London and the counties surrounding London than in the Midlands, the North or the South West. Long term this may not be sustainable, let alone desirable. Once the Green Belt has been built on it will be gone, and with it the opportunities to grow food and support nature conservation.</p> <p>Government guidance on protecting the Green Belt (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/490699/protecting-green-belt.pdf) detailed exceptions to building in the Green Belt in para 89. The only possible exception relating to the developments in Kings Langley is “limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan”. Building housing on KL-h1 (Hill Farm) or KL-h3 (Wayside Farm), being on the fringes of Kings Langley is not infilling, it is expansion. There is no indication that all the housing at these sites meets the criterion of limited</p>

	<p>affordable housing for local community needs. Therefore, these sites meet the Government's criteria and should not have their Green Belt designation removed (5.2.4 refers).</p> <p>Para 1.37 of the White Paper "Fixing our broken housing market" 7 Feb 2017 regarding the Green Belt said that however parts of it are not the green fields we often picture. The fields at Hill Farm are the green fields we picture.</p> <p>Recent statements by Sajid Javid (22 Oct 17), Theresa May (15 Nov 17) and Phillip Hammond (22 Nov 17) have all emphasised their strong protection for the Green Belt. There is an expectation that their words will have meaning locally.</p>
Include files	
Number	Question 9
ID	LPIO11704
Full Name	Susanne Rees
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The green belt was introduced to prevent urban sprawl and the Chancellor Philip Hammond reiterated at the time of the Budget, that he would not lift green belt protection.
Include files	
Number	Question 9
ID	LPIO11711
Full Name	Susanne Rees
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	National planning policy is clear that green belt status should only be changed in exceptional circumstances. The protection of the Green Belt from inappropriate development is a vitally important national and local principle.
Include files	
Number	Question 9
ID	LPIO11748
Full Name	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>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 to emphasize just a few of the most important points within that response below.</p> <p>Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>Brag Response to question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southherts.gov.uk/portal/2014/04/24/BRAG-Response-to-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character

	<p>of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO11805
Full Name	John Thomson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Whilst the para 5.2.7 check list is essential and supportable, I am not happy with para 5.2.5 because I cannot support growth options 2 and 3
Include files	
Number	Question 9
ID	LPIO11832
Full Name	peter faulkner
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>1 Green Belt Policy. You propose 4 large sites in Kings Langley all of which are in the Green The government white paper published February 2017 “Fixing our Broken Housing Market” states:-</p> <p>Step 1: Planning for the right homes in the right places. Paragraph 6. “Maintaining existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements;”.</p> <ul style="list-style-type: none"> • “Our manifesto commits ours to be the first generation to leave the natural environment better than we found it-“. • “The National Planning Policy Framework is already clear that Green Belt boundaries should be amended only “in exceptional circumstances” (their emphasis). • “authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options”. <p>You refer to this White Paper and yet fail to demonstrate that there are no other sites available for development that are not in the Green Belt. Such sites do exist.</p>
Include files	
Number	Question 9
ID	LPIO11857
Full Name	Councillor Alan Anderson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Apart from oblique references, the proposed policy does not clearly specify the over-arching requirement to retain those parts of the Green Belt in the Borough which are preventing the coalescence of settlements, e.g. Hemel Hempstead & Rucklers Lane.</p> <p>The policy should explicitly state how the Green Belt would be prioritised, ensuring that the more important parts of the Green Belt such as these are prioritised for retention.</p>
Include files	
Number	Question 9
ID	LPIO11878
Full Name	david sutherland
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Importance of Green Belt and how proposals would undermine it</p> <p>The Metropolitan Green Belt surrounding Kings Langley and the current proposals needs to be looked at against the five purposes of the Green Belt defined by the National Planning Policy Framework (NPPF) namely:</p> <ul style="list-style-type: none"> • to check the unrestricted sprawl of large built-up areas • to prevent neighbouring towns merging into one another • to assist in safeguarding the countryside from encroachment • to preserve the setting and special character of historic towns; • to assist in urban regeneration, by encouraging the recycling of derelict and other urban • , <p>It is fundamental to consider the performance of Green Belt surrounding Kings Langley on the five purposes of the Green Belt and to then consider the potential strategic harm to the integrity of the Green Belt as a result of the proposal.</p> <p>I would also remind Dacorum Borough Council of the importance of the strategic integrity of the Green Belt and the broader purpose of the wider Green Belt as set out in paragraph 81 of the NPPF namely:</p> <p><i>‘Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land’</i></p> <p>The band of Green Belt surrounding Kings Langley to the north and south</p> <p>is characterised by narrow and fragile bands of Green Belt between Hemel Hempstead and Watford/Abotts Langley. To the west, the Green Belt is more open in character with rural land and a network of open agricultural land towards Chipperfield and then looking towards the boundary of the Chilterns AONB. It is important to consider the Green Belts functional role in relation to the 5 purposes:</p> <p>Purpose 1: To check unrestricted sprawl of large built-up area</p> <p>The Green Belt surrounding Kings Langley plays a vital role in meeting this Purpose due to the presence of a number of large urban settlements i.e. Hemel Hempstead to the north and urban sprawl of Watford to the South. The fragile Green Belt surrounding Kings Langley acts to prevent the outward sprawl of both Hemel Hempstead</p>

and Watford. There is a quick transition from the urban development and sprawl of Watford to the rural open fields within the Green Belt immediately adjacent to Kings Langley i.e. Wayside Farm.

Purpose 2: To prevent neighbouring towns merging into one

The Green Belt around Kings Langley plays a vital role in meeting the Purpose.

There are a number of narrow gaps between Kings Langley, Hemel Hempstead and Abbots Langley. These parcels of land play the key role of protect the integrity of the boundary of Kings Langley and as such preventing Kings Langley from merging into each other settlements. Anything other than option 1A would fundamentally undermine this key purpose of the Green Belt.

Purpose 3: To assist in safeguarding the countryside from encroachment

The Green Belt surrounding Kings Langley plays a key role in meeting this Purpose.

To the north and south of Kings Langley is characterised by a significant amount of

built form. Wayside Farm being one of only 2 remaining jersey dairy farms in Hertfordshire and as such plays a vitally important role in providing a sense or rurality when approaching Kings Langley from Jc 20 of M25 and it is characterised by large swathes of open agricultural land. As such it plays a vital role in protecting the countryside from encroachment. I note that even your own Green Belt assessment indicates that this site(Wayside Farm) should not be progressed further and as such it should be rejected immediately.

Purpose 4: To preserve the setting and special character of historic towns

The Green Belt surrounding KL play an important role in meeting this purpose in that Kings Langley has a very important historical setting. From it's origins as a roman settlement, through to its Royal Palace in the 14th Century the historical character and setting of the village is unique and requires protection.

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Green Belt surrounding Kings Langley plays a key role in meeting this Purpose .There are a significant number of settlements enclosed by, or abutting, the Green Belt near Kings Langley, of which are of significant urban scale i.e. Hemel Hempstead, and Watford. Given the ambition to focus growth within urban areas, the Green Belt's position surrounding Kings Langley, the focus must be to encourage development on urban brownfield land in other parts of Dacorum i.e. Hemel Hempstead, Berkhamstead and Tring.

Include files

Number	Question 9
ID	LPIO11898
Full Name	Janet Mason
Company / Organisation	Berkhamsted Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas.</p> <p>Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided.</p> <p>Both stages of the Green Belt Review are flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review http://www.consultantsberkhamsted.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf</p> <p>Previous conclusions on the important role of the Green Belt by a series of Planning Inspectors have been ignored in favour of the Green Belt Reviews produced by consultants whose starting point appears to be an assumption that current Green Belt policy is wrong.</p> <p>We strongly agree with 5.2.6 about the need to consider the sustainability of proposed sites</p> <ul style="list-style-type: none"> • infrastructure, accessibility, health and well-being issues are all crucial. Consideration of the impact on the character of each town or village is also <p>We note the Inspector's Report to Dacorum Borough Council [PINS/A1910/429/4, July 2013] which states, with reference to Market Towns, "...However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town". [para 39]</p>
Include files	
Number	Question 9
ID	LPIO11945
Full Name	Dee Sells
Company / Organisation	Markyate Parish Council

Position	Parish Clerk/ RFO
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<i>In general we would agree with this policy, but are very concerned about the Green Belt around Markyate. This should prevent absorption into neighbouring villages and into neighbouring Luton Borough and Mid Bedfordshire, where there are plans under discussion which would come very close if not up to the Dacorum boundary. The need to look at sustainability in conjunction with any changes to the Green Belt is very relevant, as is the need to avoid sprawl. With very restricted public transport, access to the village facilities needs to be a reasonable walk or cycle ride, as car parking in the centre of Markyate is a real problem already. Further, as the core of the village is in the Ver valley, developments on the hillsides are not very practical, while building in the Ver floodplain needs to be avoided, with the history of flooding over many years. . We welcome further clarification on building extensions and usage within the Green Belt; business use needs defining to ensure it is appropriate to the Green Belt and that road access is adequate; there should not be a series of developments progressively eroding the Green Belt. This is not to say that modern farm adaptations to stables, livery, kennels or catteries are necessarily opposed, but need definition.</i>
Include files	
Number	Question 9
ID	LPIO11993
Full Name	Mark Behrendt
Company / Organisation	Home Builders Federation
Position	Planning Manager – Local Plans
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt We are pleased to see that the Council has looked to review its Green Belt boundaries in order to identify further land for development. Whilst we have not examined the study in detail, we would argue that the approach taken to assessing parcels against the objective to ‘ <i>preserve of the setting of historic towns</i> ’ to be inconsistent with national policy. The Green Belt Review examines the potential impact of development on any settlement with a conservation area or other historic designation. This could apply to almost any town and village

	<p>and cannot be used as the basis for considering this objective. We consider the bar for a town to be considered historic to be significantly higher.</p> <p>We would also suggest that it is wholly inappropriate to consider a "local purpose" of the Green Belt. The purposes of Green Belt are established in national policy and LPAs should not seek to add to these to take account of local considerations. This consideration should be removed from the study and not used to define whether or not land meets the purposes of Green Belt.</p> <p>It will also be important to consider the boundaries of those villages in the Green Belt. Firstly, it is important that where it is not necessary for villages to be washed over by the Green Belt they should be inset from the Green Belt. Paragraph 86 of the NPPF is clear that villages should only be included within the Green Belt where they make an important contribution to its openness. This can potentially unlock smaller sites in these villages and contribute to the delivery of much needed homes in rural areas. Secondly when defining village boundaries, it is important to define these in a way that supports development in these communities. New development in villages can support the long-term sustainability of many local services in villages and a more considered boundary can support a more appropriate response to new development.</p>
Include files	
Number	Question 9
ID	LPIO12026
Full Name	ROB RIGBY
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 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.</p> <p>The National Planning Policy Framework (NPPF) states that "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their</p>

	<p>openness and permanence”, defining five purposes of Green Belt as follows:</p> <p>To check the unrestricted sprawl of large built-up areas</p> <ul style="list-style-type: none"> • To prevent neighbouring towns merging into one another • To assist in safeguarding the countryside from encroachment • To preserve the setting and special character of historic towns • To assist in urban regeneration, by encouraging the recycling of derelict and other urban land <p>The proposals by Dacorum Council appears to breach ALL five safeguards.</p>
Include files	
Number	Question 9
ID	LPIO12029
Full Name	ROB RIGBY
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 National Planning Policy Framework (NPPF) states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence”, defining five purposes of Green Belt as follows:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built-up areas • To prevent neighbouring towns merging into one another • To assist in safeguarding the countryside from encroachment • To preserve the setting and special character of historic towns • To assist in urban regeneration, by encouraging the recycling of derelict and other urban land <p>The proposals by Dacorum Council appears to breach ALL five safeguards.</p>
Include files	
Number	Question 9
ID	LPIO12045
Full Name	David Wilyman
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 & 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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>Standard BRAG response to Question 9. Please note full document is attached to Question 46</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southherts.gov.uk/portal/2014/08/BRAG%20Green%20Belt%20Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations

	<ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO12098
Full Name	Colin Blundel
Company / Organisation	Chiltern Society
Position	Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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 are generally opposed to development within the Green Belt because it is an essential component in maintaining the openness and character and appearance of the Chilterns landscape.</p> <p>Given that half of the Borough is designated as Green Belt and much of the rest is either built on or within the AONB we may have to reluctantly accept that some development may have to take place in the Green Belt, particularly where it is immediately adjacent to towns and larger villages. We would expect the Council to</p>

adopt a housing target that can be met within urban areas, brownfield sites and sites where the Green Belt is no longer considered to meet its purposes. The latter must be sites identified through the Green Belt Review. Any incursions into the wider Green Belt must be able to demonstrate very special circumstances, and we do not accept that demand for housing on its own creates such a circumstance.

The housing requirements identified for Dacorum are very high and it is difficult to see how development could be accommodated in adjacent districts as they have their own high housing targets and significant areas of Green Belt or AONB. However, to get the best outcome for the Green Belt, Dacorum needs to work with adjacent authorities to take a co-ordinated approach to the Green Belt. This may cross over Housing Market Areas in Hertfordshire and Buckinghamshire.

We are pleased to see in 5.2.4 that most of the Green Belt meets the Government's criteria for designation.

We consider that encroachment into the Green Belt must be a last resort for development. As the Plan emerges it will need to demonstrate that it has fully considered brownfield sites, sites within towns and villages and sites outside the Green Belt and AONB before considering Green Belt boundary changes and site allocations. Paragraph 5.2.7 starts to set out a structured approach.

In particular, the Council needs to assess the 5 purposes of the Green Belt set out in paragraph 80 of the NPPF and apply these to potential development sites. Housing in the Green Belt is, by definition, inappropriate development and the Council will need to demonstrate that there are very special circumstances for allowing this development. Our view is that the need for additional housing does not provide a sufficient reason for exceptional circumstances to exist.

Where land is proposed to be removed from the Green Belt, additional land should be identified to create new Green Belt elsewhere in the Borough where the land can be demonstrated to meet Green Belt purposes. It is possible that some of these sites could also be in the AONB, giving them additional protection from development.

Paragraph 5.2.6 raises the issue of infrastructure to ensure that developments are sustainable. This is an essential element of any decision to encroach of Green Belt adjacent to the towns. Such infrastructure needs to be carefully planned to minimise the loss of openness and maintain the quality of the landscape.

The Green Belt is an essential element in finalising the capacity of Dacorum to cater for new development. Therefore, development needs to be restricted to the

	<p>absolute minimum in terms of numbers of dwellings to protect the important local environment of the Borough.</p> <p>We are supportive of the approach to Major Developed Sites.</p> <p>We would support the retention of the use of village boundaries, but the Council would need to find a way to ensure that they are defensible in relation to planning applications and appeals.</p>
Include files	
Number	Question 9
ID	LPIO12117
Full Name	SUSAN DANIELL
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I wish to register my objection to any building on Green Belt sites around the edge of towns and villages within Dacorum Borough Council, as being considered in the Dacorum Local Plan consultation.
Include files	
Number	Question 9
ID	LPIO12135
Full Name	Ray 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>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> <p>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed,</p>

confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

Standard BRAG response to Question 9. Please note full document is attached to Q46.

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/portal/2014/04/24/BRAG-Stage-1-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
 - Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to
 - The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded

	the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."
Include files	
Number	Question 9
ID	LPIO12201
Full Name	Douglas & Christina Billington
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 & 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>Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. Q8. The Core Strategy Settlement Hierarchy states "Hemel Hempstead will be the focus for housing development within the borough", while recognising that the Market Towns are "Areas of Limited Opportunity" and "The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs." This Settlement Hierarchy was ratified by the Core Strategy Inspector who concluded that "the Council's approach of focussing growth on Hemel Hempstead is justified." The Inspector points to "the sustainability credentials" of Hemel and contrasts that to the Market Towns where "The level of services and facilities is lower than at Hemel", while also confirming that "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town." The reality is that the first 10 years of the Core Strategy has seen development in Berkhamsted at a rate 34% above the target set, but with no infrastructure improvements</p>

to match, while development in Hemel is 21% below its target.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southhants.gov.uk/portal/2014/08/24/brag-answers-to-questions-asked-by-dbc-2014-08-24/> Review undertaken for DBC by SKM-final version.pdf).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
 - Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.
 - The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main Town."

Include files	
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Number	Question 9
ID	LPIO12280
Full Name	Richard Frankel
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 & 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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>Standard BRAG response to Question 9. Please note full document is attached to Question 46.</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.suffolk.gov.uk/your-council/2014/DBC-Analysis-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed

	<p>sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO12337
Full Name	Mr Brian Kazer
Company / Organisation	Tring in Transition
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>Para 5.2.1 of the Plan is unintentionally misleading.</p> <p>We would strongly recommend that para 80 of the NPPF be reproduced in full instead of the current summary/omission of some key elements.</p> <p>Tr-h6 was concluded by the Arup Report “Green Belt Review and Landscape Appraisal Stage 2 January 2016” as <i>“it is also almost completely constrained by AONB and has a number of other non-absolute constraints which, although don’t preclude development, make it less preferential. Exclude from further assessment and</i></p>

	<p><i>retain as Green Belt." Tr-h6 should be excluded from Plan.</i></p> <p>Definitions of "high density", "medium density" and "low density" are needed in respect of housing developments.</p>
Include files	
Number	Question 9
ID	LPIO12341
Full Name	ms rona morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>DBC seems too keen to find ways to remove land from the Green Belt. The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town." I keep coming back to question of whether this is a result of it driven by ease (developers keen and can be quicker) and the higher CIL payments from Berkhamsted (£250 per square metre compared to £100 in Hemel). I trust that the councillors will endeavour to produce the best answer not the easiest and most profitable.</p>
Include files	
Number	Question 9
ID	LPIO12424
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 & 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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous</p>

conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

Standard BRAG response to Question 9. Please note full document is attached to Question 46.

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
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	the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."
Include files	
Number	Question 9
ID	LPIO12472
Full Name	Meenakshi Jefferys
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 & 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>Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southherts.gov.uk/portal/2014/05/BRAG%20-%20Green%20Belt%20Review%20undertaken%20for%20DBC%20-%20final%20version.pdf). Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed,

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Include files	
Number	Question 9
ID	LPIO12519
Full Name	Mrs Jane Barrett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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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Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

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 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
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Include files	
Number	Question 9
ID	LPIO12568
Full Name	mr paul healy
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 & 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>DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to

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Include files	
Number	Question 9
ID	LPIO12618
Full Name	Merrick Marshall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) have 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 as confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

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Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

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 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
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	<p>adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to</p> <ul style="list-style-type: none"> • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO12667
Full Name	Monika & Casper Gibilaro
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 & 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</p> <p>Q3 & Q9. DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in

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Include files	
Number	Question 9
ID	LPIO12715
Full Name	Lorna Ginn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

Here are my comments on the new Local Plan

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.

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Include files	
Number	Question 9
ID	LPIO12764
Full Name	Mr Raymond Phipps
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 wish to comment as follows to the Strategic Options Consultations. In general I follow the comments made by BRAG.</p> <p>...</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to the Stage 1 Green Belt Review (http://www.southants.gov.uk/sites/default/files/2014/08/BRAG%20stage%201%20Review-undertaken-for-DBC-by-SKM-final-version.pdf). • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants

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Include files	
Number	Question 9
ID	LPIO12811
Full Name	Ingrid Carola McKenna
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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.

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Include files	
Number	Question 9
ID	LPIO12859
Full Name	Mr Stephen Lally
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.</p> <p>...</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to the Stage 1 Green Belt Review (http://www.suffolk.gov.uk/sites/default/files/2014/04/BRAG%20-%20Green%20Belt%20-%20Review-undertaken-for-DBC-by-SKM-final-version.pdf). • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and

	<p>wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main Town ”
Include files	
Number	Question 9
ID	LPIO12909
Full Name	Jon Whittle
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 & 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>DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.</p>

Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/sites/default/files/2016-07/BRAG%20Stage%201%20Green%20Belt%20Review%20undertaken%20for%20DBC%20by%20SKM%20final%20version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."

Include files	
Number	Question 9
ID	LPIO12962
Full Name	Edward Keane
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 & 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>Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt</p> <p>should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning</p> <p>Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent</p> <p>Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southants.gov.uk/portal/2014/08/20/BRAG-Analysis-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt

	<p>Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.</p> <ul style="list-style-type: none"> • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main Town.”
Include files	
Number	Question 9
ID	LPIO13011
Full Name	Bettina Deuse
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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 to emphasize just a few of the most important points within that response below.

Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to question 9 below (full BRAG response see question 46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.sustrans.org.uk/sites/default/files/2014/07/BRAG%20Analysis%20of%20Green%20Belt%20Review%20undertaken%20for%20DBC%20by%20SKM%20final%20version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
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 - The Inspector's report [July 2013] records "it must be remembered that many of these

	settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"
Include files	
Number	Question 9
ID	LPIO13064
Full Name	Mr Paul Tinworth
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 wish to express my full agreement with the response from the Berkhamsted Residents Action Group regarding Dacorum's Local Plan.</p> <p>...</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/sites/default/files/2016/04/BRAG%20Green%20Belt%20Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations.

	<ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main Town.”
Include files	
Number	Question 9
ID	LP1013112
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>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> <p>Q3 & Q9. DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p>

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/sites/default/files/2014/04/BRAGs%20Full%20Response%20to%20the%20Stage%201%20Green%20Belt%20Review%20undertaken%20for%20DBC%20by%20SKM%20final%20version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
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 - The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main Town."

Include files

Number	Question 9
ID	LPIO13161
Full Name	Mr J P Goodings
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>See objections by Grove Field residents association to Green Belt being built on.</p> <p>GFRA RESPONSE TO 9</p> <ul style="list-style-type: none"> We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in The Housing White Paper¹⁰ clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be <p>10 Housing White Paper, February 2017</p> <p>undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <ul style="list-style-type: none"> To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt

- If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 8011, which is considered in principle to be a reasonable starting
- However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).
- The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the

11 Paragraph 80, National Planning Policy Framework (2012)

consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

- Nevertheless the general approach within Stages 1 and 2 are in principle
- It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.
- We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

	<ul style="list-style-type: none"> It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable <p>location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <ul style="list-style-type: none"> As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance. <i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i>
Include files	
Number	Question 9
ID	LPIO13178
Full Name	Mr J G Botha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The brownfield sites of Dacorum should be properly considered before any consideration of building on Green Belt should be made. Kings Langley is in danger of losing its village status and becoming a town. One of the main attractions of Kings Langley is the rural setting. Large

	scale development will have a detrimental effect and Kings Langley will lose its village feel.
Include files	
Number	Question 9
ID	LPIO13241
Full Name	P. E. Jewle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><u>No to building on Green Belt sites</u></p> <p>Please, please don't destroy more of our Green Belt by building houses in a totally unsuitable site. Farmlands are such a wonderful place for our wildlife so very important for the future. Look again at brownfield sites. So many overworked facilities will suffer as well.</p>
Include files	
Number	Question 9
ID	LPIO13256
Full Name	D. Phillips
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 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.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on green belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p>

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

No

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review ~~(www.leamington.gov.uk/2013/07/05/green-belt-review-1/)~~
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"

Include files	
Number	Question 9
ID	LPIO13281
Full Name	Mr Mike Leon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt should be protected at all costs.
Include files	
Number	Question 9
ID	LPIO13284
Full Name	Mrs Jill Leon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt should be protected at all costs.
Include files	
Number	Question 9
ID	LPIO13304
Full Name	S.A. Grimes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I am totally opposed to building on Green Belt. Most of the proposals seemed to be designed to ruin the quality of life in Bovingdon.
Include files	
Number	Question 9
ID	LPIO13320
Full Name	Mrs Maureen Dyer
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	So I say again <u>please, please</u> leave the green belt as it is
Include files	
Number	Question 9

ID	LPIO13349
Full Name	Mrs Christine Pettit
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The greenbelt is under your protection. Don't destroy it.
Include files	
Number	Question 9
ID	LPIO13364
Full Name	Mrs Christine Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt is there for a reason - don't build on it
Include files	
Number	Question 9
ID	LPIO13365
Full Name	Mr Alan Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt is there for a reason - don't build on it
Include files	
Number	Question 9
ID	LPIO13446
Full Name	Mrs Catherine Imber
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

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, we request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

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

'The studies conclude that most of our Green Belt meets the Government's criteria for designation. There are however a few areas which don't meet all of the criteria and so could have their Green Belt designation removed. This could allow planned development to then take place.'

The impression is that you will look at all Green Belt and any which don't meet all the criteria as set by the Government will be developed, irrespective of whether they are appropriate in terms of infrastructure etc.

'A key purpose of Green Belt is to keep a sense of openness between built up areas (in this case around London), together with other factors such as protecting the countryside from development and supporting urban regeneration.

Green Belt also provides opportunities for people to access the countryside, to grow food and support nature conservation.'

-

Green Belt is vital to preserve the nature of our countryside. Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
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 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants

	<p>whose starting point appears to be an underlying belief that current Green Belt policy is wrong.</p> <ul style="list-style-type: none"> • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO13494
Full Name	Deborah Smith
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 & 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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous</p>

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BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

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 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/sites/default/files/2016/07/BRAG-Analysis-of-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
 - Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to
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	the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."
Include files	
Number	Question 9
ID	LPIO13538
Full Name	John Rush
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 all too convenient to attack Green Belt land, thereby creating more pressure on the Green Belt and AONB that remains. I can only hope that common sense will prevail.
Include files	
Number	Question 9
ID	LPIO13549
Full Name	Mr Alan O'Neill
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 & 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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should

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Include files	
Number	Question 9
ID	LPIO13602
Full Name	Sue O'Neill
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 & 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>Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/portal/2016/06/20/BRAG-Analysis-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already

	<p>developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to</p> <ul style="list-style-type: none"> • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO13645
Full Name	Moira and David Lea
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green Belt</p> <p>The Green belt was brought into legislation for exactly the purpose of protecting our green spaces and providing a buffer for London for wildlife and for the people of London to enjoy the countryside.</p>
Include files	
Number	Question 9
ID	LPIO13664
Full Name	Tim Uden
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) 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 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>DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous</p>

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	the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."
Include files	
Number	Question 9
ID	LPIO13729
Full Name	Edward Hatley
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 & 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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored. In their place, the flawed, confirmation biased Green Belt Reviews produced by consultants have been favoured. Their starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/portal/2014/05/BRAG%20-%20Green%20Belt%20Review%20undertaken%20for%20DBC%20by%20SKM%20final%20version.pdf). Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed,

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Include files	
Number	Question 9
ID	LPIO13777
Full Name	Mr Roger Didham
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 & 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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Include files	
Number	Question 9
ID	LPIO13784
Full Name	E.H.Smith (Holdings) Ltd
Company / Organisation	C/O Brasier Freeth
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><u>DACORUM BC – ISSUES AND OPTIONS CONSULTATIONS LOCAL PLAN TO 2026 NOVEMBER, 2017</u></p> <p>RESPRESENTATIONS ON BEHALF OF E. H. SMITH (HOLDINGS) LTD – BOVINGDON BRICKWORKS SITE IN RESPECT TO MATTERS RELEVANT TO:</p> <p><i>Q.5 – DOES OUR CURRENT CORE STRATEGY REFLECT THE SPECIFIC LOCAL ASPIRATIONS AND / OR QUALITIES YOU FEEL SHOULD CONTINUE TO BE REFLECTED IN THE VISIONS FOR BOVINGDON?</i></p> <p><i>Q.9 - DO YOU AGREE WITH THE PROPOSED APPROACH TO THE GREEN BET AND MAJOR DEVELOPMENT SITES?</i></p> <p>1 INTRODUCTION</p> <p>1 We are formally instructed by E. H. Smith (Holdings) Ltd (the parent company for Bovingdon Brickworks) to submit a holding representation in respect of DDC's Issues and Options Local Plan to 2026, November, 2017. As discussed at a meeting with John Chapman and Andrew Homer at a meeting held at DDC's Offices on the 12th October, 2017 (also attended by Julie Geaves – HCC Minerals & Waste Policy Manager), E.H.Smith (Holdings) Ltd, as a responsible landowner, is currently looking to explore all future development options for the site, which includes the possible redevelopment of the existing Bovingdon Brickworks infrastructure for Class B1, B2 and B8 employment uses. The existing E. H. Smith (Holdings) Ltd Builders Merchants is to be</p>

retained on site as an ongoing commercially viable business operation.

1 POLICY BACKGROUND

1 The site has a long and complex planning history comprising both permitted development and established uses dating back to the time of the Second World War. More recently there have been a number of mineral extraction and open brick storage consents for the site and surrounding land including Pocket's Dell and Cox & Croft Fields (4/0225-99; 4/0187/00CMA; and 4/2819-15 (CM0017).

1 In planning policy terms, the site was identified in the:

- Adopted Core Strategy, 2013 as a 'Major Development Site' in the Green Belt subject to Policy CS5: Green Belt / Table 2;
- Adopted Site Allocations 2006-2031, July 2017 as a Major Development Site subject to Policy SA2: Major Development Sites in the Green Belt / Schedule of Major Development Sites (MDS/5); Policy SA6: Employment Areas in the Green Belt / Table of Employment Areas in the Green Belt; Bovingdon Place Strategy / Schedule for Bovingdon; and Appendix 3: Outer and Infill Areas for Major Development Sites in the Green Belt (site plans) including Bovingdon Brickworks; Bovingdon Prison; Kings Langley School; Bourne End Mills; Abbots Hill School; Berkhamsted Castle Village; Ashlyns School; and the British Film Institute.

1 PROPOSED POLICY CHANGES

1 With respect to the current planning policy context for MDS sites in the Green Belt, it is evident that the site plans included in Appendix 3 of the Adopted Site Allocations 2006-2031, July 2017 for the 'Major Development Sites in the Green Belt' identify both the MDS's 'Outer' landownership boundaries (outlined in blue) and an 'Infill Area' boundaries (outlined in red) where development will be permissible provided it has no significant impact on the character and appearance of the countryside and it supports the rural economy and maintenance of the wider countryside (Adopted Core Strategy Policy CS5). In the context of the Bovingdon Brickworks site, it is evident that the Appendix 3 'Outer' boundary does not relate to E H Smith (Holdings) Ltd landownership boundary and that no separate 'Infill Area' has been identified outlined in red (albeit it is noted that in the context of the Schedule of Major Sites – Bovingdon

Brickworks (MDS/5) that the text states that *'External boundary should be treated as the infill area subject to the intensity of any future development being appropriate for the Green Belt location'*.

- 1 On this basis, it is important for the sake of adopting a consistent approach to defining MDS boundaries that E. H. Smith (Holdings) Ltd landownership boundary should be outlined in blue as part of a proposed amendment to the Appendix 3 'Outer' and 'Infill Areas' for Major Development Sites in the replacement Local Plan along with a separate red outline area identifying where infill development will be permitted. The proposed amendment to the current Appendix 3 site plan for Bovingdon Brickworks is attached as Plan 1.

- 1 In proposing an amendment of the MDS site plan on technical grounds relating to the external boundary, E. H. Smith (Holdings) Ltd consider that the proposed 'Infill Area' red line boundary can be justified on the following grounds:
 - In order to facilitate the potential future redevelopment of the existing Bovingdon Brickwork buildings for modern Class B1, B2 and B8 uses, the 'Infill Area' boundary needs to include the north-eastern part of the site area comprising concrete hard-standing area (NB: The whole of the site constitutes Previously Developed Land). Not to do so would result in a very cramped, limited redevelopment area, with limited opportunity for strategic landscaping and space for car parking / access by delivery vehicles. It is evident a high quality, low rise scheme, with significant landscape buffers, would have less impact on the openness of the Green Belt than the existing brickworks buildings and would contribute towards other environmental improvements, such as the restoration of the open brick storage land located within the south eastern part of the site;
 - Land directly to the south east of E. H. Smith (Holdings) Ltd Builders Merchants has been used for the last 20 years for outdoor storage use, mainly for bricks. As such, E. H. Smith (Holdings) Ltd has acquired established use rights over this land which it wishes to continue to use for outdoor storage uses, including car parking;
 - In conjunction with the proposed MDS boundary changes, it is also proposed the route of the existing Public Footpath which runs through the southern part of the site (north-east / south-west axis) should be made the subject of a footpath diversion order to relocate it to the south of the proposed infill development area. This would enable the security of the existing E.H. Smith

	(Holdings) Ltd Builders Merchants and Bovingdon Brickworks operations to be improved;
	<p>1 CONCLUSIONS</p> <p>1 In support of E H Smith (Holdings) Ltd representations, the Company would be happy in due course to commission the preparation of a draft master plan and landscape value assessment for the proposed redevelopment of the Bovingdon Brickworks part of the site including environmental improvements.</p>
Include files	
Number	Question 9
ID	LPIO13834
Full Name	Alex 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>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> <p>DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village

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Include files	
Number	Question 9
ID	LPIO13883
Full Name	Patricia Hardy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	1 Green Belt land is sacrosanct and no one should be allowed to build on it – EVER
Include files	
Number	Question 9
ID	LPIO13899
Full Name	Angela Vaux
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Do not wish anyone to build on green belt!
Include files	
Number	Question 9
ID	LPIO13921
Full Name	David and Katie Hannah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><u>Question 9</u> Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</p> <p>No. I believe that we should stand by the often quoted desire to protect ‘sacrosanct’ greenbelt as much as we can, particularly those areas that also function as productive farming land – given the increasing requirement post Brexit for increased food production. As the Chancellor stated in the budget, it is a priority to make the</p> <p>“best use of our urban land, and continuing the strong protection of our green belt”.</p> <p>If, as stated in June 2016 by the Minister of State for Housing and Planning, Brandon Lewis, that “. . . Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people.” then I believe it is vital that time is taken to select only those large scale releases that have the capacity to deliver high volume housing with significant infrastructure elements to support quality of life within the town for</p>

	existing and new inhabitants. There should be no salami slicing of small areas of greenbelt that lack this capacity, purely to deliver profits to absentee landowners and distant and disengaged developers who have no interest in the long term viability of their developments beyond completion and pay day.
Include files	
Number	Question 9
ID	LPIO13928
Full Name	Cynthia Longbottom
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In conclusion future generations deserve to be able to enjoy our countryside which at the moment is protected by the Green Belt. Any erosion of this protection should be stopped.
Include files	
Number	Question 9
ID	LPIO13930
Full Name	C Wright
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 also vital that no further development on the Green Belt should occur. The Green Belt is a well-managed buffer between the town and the Chiltern AONB. The valleys and hills on both sides of the town contribute greatly to its character and distinctive appearance. The gradual erosion of this buffer means the openness and beauty of the Chilterns as we know it will be threatened by encroachment and unnecessary development.
Include files	
Number	Question 9
ID	LPIO13954
Full Name	Nigel Hewitt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt is there for a reason!!! We cannot build on it!! There is plenty of Brown sites that can be developed, this must happen first.
Include files	
Number	Question 9
ID	LPIO13967
Full Name	Dr Philip Rutter
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Finally, I think it is worth recalling the Government's own position expounded in the 2017 autumn budget. The statement was clear: Green Belt land should be protected from exploitation for housing. Rather, housing needs should be met by expanding provision within urban environments: ' <i>... introducing planning reforms that will ensure more land is available for housing, and that maximises the potential in cities and towns for new homes while protecting the Green Belt.</i> ' (p.3) The reasons for this are clearly set out in Chapter 5 of the Government's Budget Report.
Include files	
Number	Question 9
ID	LPIO13992
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Building on our Green Belt should not be an option with so many other sites better suited (e.g. brownfield) and readily available
Include files	
Number	Question 9
ID	LPIO14004
Full Name	Danny Jennings
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 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>BRAG response to Question 9 lease note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southamshire.gov.uk/portal/2016/04/20/BRAG-Response-to-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.

	<ul style="list-style-type: none"> The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main Town."
Include files	
Number	Question 9
ID	LPIO14053
Full Name	Mr John Goffey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>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.</p> <p>...</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/sites/default/files/2014/08/BRAG-Analysis-of-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.

	<ul style="list-style-type: none"> Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO14101
Full Name	Sue Elleray
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 & 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>Q3 & Q9. DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt</p>

should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning

Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent

Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.sustrans.org.uk/sites/default/files/2016/04/BRAG%20-%20Green%20Belt%20Review%20-%20undertaken%20for%20DBC%20-%20final%20version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
 - Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.

	<ul style="list-style-type: none"> The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."
Include files	
Number	Question 9
ID	LPIO14152
Full Name	Mr Richard White
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 disagree with the Dacorum Local Plan proposals for the reasons stated in the BRAG response</p> <p>...</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/portal/2014/08/BRAG-Response-to-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character

	<p>of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main Town.”
Include files	
Number	Question 9
ID	LPIO14194
Full Name	L Laws
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 proposed development on the Green Belt in around Kings Langley because:</p> <p>The Green Belt is essential to our community lives and childrens future. We must safeguard all our 'Green' facilities and their needs. It is a moral principle for our and all of mankind's future. Any building and developments should be on 'brown sites'.</p> <p>Our environment, road and public facilities will not stand further usage.</p>
Include files	
Number	Question 9
ID	LPIO14235
Full Name	M. Ather
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<u>NO BUILDING</u> on the <u>GREEN BELT</u>
Include files	
Number	Question 9
ID	LPIO14237
Full Name	Mr + Mrs E. Phillips
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<u>No</u> to be building on green belt
Include files	
Number	Question 9
ID	LPIO14267
Full Name	Judith E Ashford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Why are green belt areas being used? NO
Include files	
Number	Question 9
ID	LPIO14275
Full Name	Mr Jonathan Checkley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We must not loose our green belt - any of it!
Include files	

Number	Question 9
ID	LPIO14293
Full Name	Ms Vicky Tattle
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 & 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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southherts.gov.uk/portal/2014/08/BRAG%20-%20Green%20Belt%20Review%20undertaken%20for%20DBC%20-%20final%20version.pdf). <ul style="list-style-type: none"> Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed

	<p>sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO14343
Full Name	Mrs J M Sparks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The DBC Green Belt Plan is flawed. Any adjustments in Green Belt should have been completed before considering planned new sites. The consultants/DBC have ignored current policy to protect green Belt. Even accepting some requirements may need adjustment, the scale indicated in your plans ignores both intentions and policy to protect Green Belt. Brown Field sites must have priority. DBC has, in fairness, utilised this option in Hemel Hempstead. There remain further sites that can be developed.
Include files	
Number	Question 9
ID	LPIO14355

Full Name	Mr Humphreys
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 9
ID	LPIO14382
Full Name	Ray Tattle
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) 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> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village

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 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."

Include files	
Number	Question 9
ID	LPIO14430
Full Name	Giselle Okin
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) 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> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/portal/2014/06/24/BRAG-Response-to-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to • The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the

	Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."
Include files	
Number	Question 9
ID	LPIO14479
Full Name	Mr David Griffin
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>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.</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>DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</i></p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village <ul style="list-style-type: none"> Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southherts.gov.uk/portal/2014/05/BRAG%20-%20Green%20Belt%20Review-undertaken-for-DBC-by-SKM-final-version.pdf). Previous conclusions on Green Belt by a series of Planning Inspectors have

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Include files	
Number	Question 9
ID	LPIO14521
Full Name	Mrs M Morgan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt should not be built on and the disappearance of farmland would be a travesty - it would not be a 'village' anymore
Include files	
Number	Question 9
ID	LPIO14583

Full Name	Mrs R. Prentice
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt around the village should not be built on. The village needs its green space. This is a threat to the villages character
Include files	
Number	Question 9
ID	LPIO14604
Full Name	Mrs Carolyn Connor
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There should be no building on green belt land in Kings Langley.
Include files	
Number	Question 9
ID	LPIO14612
Full Name	Paul Hines
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt should be protected not swallowed up under a sea of concrete
Include files	
Number	Question 9
ID	LPIO14641
Full Name	Mr A. Miles
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We cannot build on our green belt sites without risking the destruction of the very fabric of our village.
Include files	
Number	Question 9
ID	LPIO14651
Full Name	Pauline Quelch
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt should be kept as such, we need some open spaces.
Include files	
Number	Question 9
ID	LPIO14665
Full Name	Ann Bunn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I strongly believe that to build on GREEN BELT and agricultural land is detriment for our future generations. We have and still enjoy the pleasures of open spaces, walking through beautiful countryside plus the abundance of wildlife which these spaces provide shelter and food for their needs, all these on our doorstep. SO PLEASE let our future generations enjoy these beautiful benefits. It is all part of the Well being of our lives.
Include files	
Number	Question 9
ID	LPIO14677
Full Name	Ann Bunn
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 9
ID	LPIO14692
Full Name	Mrs Gillian Bailey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt land, should not be used for any development. The green belt is what creates a good environment for each town/village.
Include files	
Number	Question 9
ID	LPIO14706
Full Name	mr ron perkins
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 9
ID	LPIO14714
Full Name	Mrs Jean Perkins
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 9
ID	LPIO14721
Full Name	Mrs J M Ensor
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Any building on Green Belt must NOT happen. The preservation of this land was promised to us and our children!!
Include files	
Number	Question 9
ID	LPIO14731
Full Name	Mr Alan Gurnett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In summary, i do not consider that any Green Belt land in Bovingdon (or anywhere else in Dacorum for that matter) needs to be or should be developed, and that I support Build Option 2B provided that all aspects of the village infrastructure are made <u>fit for purpose</u> before any further development is commenced.
Include files	
Number	Question 9
ID	LPIO14733
Full Name	Mrs Audrey Beach
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There should be no more development of green belt land, as once it is gone it is gone for ever - it cannot be brought back.
Include files	
Number	Question 9
ID	LPIO14756
Full Name	Ms Paula Farnham
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 (or will be) responded (ing) in full to the 'Issues & 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.</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>Q3 & Q9. It appears the councils Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. What checks and balances are put in place to ensure that third party reports are accurate, unbiased and objective for the needs of local people? I refer to the recent Leisure Review and a report produced that was developed to review parking in Berkhamsted as evidence that these third party reports do not reflect fact.</p> <p>Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/portal/2014/08/24/BRAG-Analysis-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). <ul style="list-style-type: none"> • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and

	<p>wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO14805
Full Name	Steve Baker
Company / Organisation	CPRE - The Hertfordshire Society
Position	Planning Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Minimising the loss of Green Belt land to development must be a priority for the new Local Plan because this is a national Planning policy priority as restated recently by the Government. The proposed approach to Green Belt set out in paragraph 5.2.2 of the document, tries to balance the two conflicting requirements; of planning for enough sustainable development to meet the future needs of Dacorum; and protecting the Green Belt from most types of development. This is incorrect because housing need alone is not an “exceptional circumstance” which would justify loss of Green Belt Land.</p> <p>Paragraph 5.2.7 of the Issues and Options document sets out the checklist from the Housing White Paper. CPRE strongly promotes the first stated bullet point of making best use of brownfield sites and welcomes the Council’s commitment to preparing a Brownfield Land</p>

	<p>Register. However, as stated in a recent article in The Planner 12/12/17</p> <p>Multiple Choice/2/3/9 and 2/3/9 sites identified in CPRE is concerned that brownfield land registers are failing to record small plots of land and that a full range of sites should be identified in towns and villages.</p> <p>A Neighbourhood Plan process can assist with the identification of small sites, especially in villages. All Neighbourhood Planning Bodies should be encouraged by the Borough Council to contribute to the Brownfield Land Register.</p>
Include files	
Number	Question 9
ID	LPIO14827
Full Name	Bev Mckenna
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 & 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.</p> <p>In addition, I draw attention to some of the most important points within that response</p> <p>Q3 & Q9. DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open

areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.

- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/sites/default/files/2014/08/BRAG-Analysis-of-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main Town."

Include files

Number	Question 9
ID	LPIO14874
Full Name	Mr Michael Curry
Company / Organisation	Tring Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>There is confusion on the Government's position with regard to the Green Belt and what constitutes 'exceptional circumstances'. A recent statement said no houses would be built on Green Belt</p> <p>Paragraph 5.2.4 in the Issues & Options Local Plan implies that failure to meet one of the Government's criteria* is sufficient to remove the land in question from the Green Belt.</p> <p>This is unacceptable as the contribution made under certain criteria could be exceptional e.g. to preserve the setting and special character of historic towns whilst weak in another. Clarity should be given to what justifies removal of Green Belt status before considering locations.</p> <p>Paragraph 5.2.6 as worded appears to relegate the status of Green Belt land is assessing the suitability of a location for development. A site should have to fail a threshold test in terms of its contribution as Green Belt before these further considerations come into play.</p> <p>For example the Stage 2 Green Belt Review recommendations for sites Tr-h1 and Tr-h6 be retained as Green Belt.</p> <p><i>* The National Planning Policy Framework:</i></p> <p><i>"80. Green Belt serves five purposes:</i></p> <ul style="list-style-type: none"> <i>• to check the unrestricted sprawl of large built-up areas;</i> <i>• to prevent neighbouring towns merging into one another;</i> <i>• to assist in safeguarding the countryside from encroachment;</i> <i>• to preserve the setting and special character of historic towns; and</i> <i>• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land"</i>
Include files	
Number	Question 9
ID	LPIO14929
Full Name	Malcolm and Jill Allen
Company / Organisation	
Position	
Agent Name	

	<p>wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO14979
Full Name	Mr Clive Freestone
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 & 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>DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by</p>

consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. Q8. The Core Strategy Settlement Hierarchy states “Hemel Hempstead will be the focus for housing development within the borough”, while recognising that the Market Towns are “Areas of Limited Opportunity” and “The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs.” This Settlement Hierarchy was ratified by the Core Strategy Inspector who concluded that “the Council’s approach of focussing growth on Hemel Hempstead is justified.” The Inspector points to “the sustainability credentials” of Hemel and contrasts that to the Market Towns where “The level of services and facilities is lower than at Hemel”, while also confirming that “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.” The reality is that the first 10 years of the Core Strategy has seen development in Berkhamsted at a rate 34% above the target set, but with no infrastructure improvements to match, while development in Hemel is 21% below its target.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to the Stage 1 Green Belt Review (<http://www.southhants.gov.uk/sites/default/files/2016/06/BRAG-Analysis-of-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character

	<p>of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO15029
Full Name	Mr & Mrs D A Simmons
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 & 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, <i>in particular our response to Q25.</i></p> <p>DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being</p>

arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village
 - Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.southants.gov.uk/sites/default/files/2016/04/BRAGs-Stage-1-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).
 - Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
 - Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
 - Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to
 - The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."

Include files

Number	Question 9
ID	LPIO15069
Full Name	Roger Welchman
Company / Organisation	AR Planning
Position	Associate
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 9 of the Issues and Options consultation</p> <p>It is important to consider the boundaries of those villages in the Green Belt, like Potten End. It is not necessary for all villages to be washed over by the Green Belt. Paragraph 86 of the NPPF is clear that villages should only be included within the Green Belt where they make an important contribution to its openness. This can unlock smaller sites in these villages and contribute to the delivery of much needed homes in rural areas. Secondly when defining village boundaries, it is important to define these in a way that supports development in these communities. New development in villages can support the long-term sustainability of many local services in villages and a more considered boundary can support a more appropriate response to new development.</p> <p>Larger villages like Potten End can be inset from the Green Belt and village boundary extended with no detriment to the openness of the Green Belt. It would allow for limited appropriate infill which in turn would support the local services and in turn the long term sustainability of such settlements. The arbitrary drawing of the settlement boundary in Potten End should be amended in any case to reflect the core of the village and proximity to services in the centre of the village. Please see first attachment with suggested amendment to village boundary shown in red.</p>
Include files	Roger Welchman - Proposals map extractv1.JPG
Number	Question 9
ID	LPIO15075
Full Name	Tom Simmons
Company / Organisation	St William Homes LLP
Position	Development Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The New Local Plan seeks to minimise the impact of new development on the Green Belt whilst acknowledging that in excess of 50% of the Borough is designated as Green Belt. The New Local Plan also states that a Green Belt review has been undertaken

	<p>and identified some areas which do not meet all of the Governments designation criteria.</p> <p>Whilst St William would not object to future Green Belt release should it be robustly justified, it is considered that every attempt should be made to meet the Borough's locally assessed need by optimising brownfield sites. Given the low availability of brownfield sites increased densities should be supported on those which are developable, particularly in areas of good public transport accessibility. Such an approach would also positively contribute towards meeting the Borough's aspiration of delivering 1,130 new homes as part of regeneration of the Two Waters and Apsley area of Hemel Hempstead.</p>
Include files	
Number	Question 9
ID	LPIO15100
Full Name	Grand Union Investments
Company / Organisation	Grand Union Investments C/O Savills
Position	Associate Director
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The NPPF at paragraph 80 confirms that the Green Belt serves five purposes, as follows:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built-up areas; • To prevent neighbouring towns merging into one another; • To assist in safeguarding the countryside from encroachment; • To preserve the setting and special character of historic towns; and • To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>The NPPF also advises at paragraph 83 that <i>'once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan'</i>. Whilst setting a high bar of 'exceptional circumstances, it is an option for a local authority to review the Green Belt in order to accommodate its growth requirements. Green Belt release is a necessity within the period of the Local Plan to 2036 given the scale of the district's development requirements. Furthermore, the necessary 'exceptional circumstances' are present due to the scale of growth required, the need to plan for this in a sustainable way and the lack of non-Green Belt alternatives. Most notably of all, the Inspector's Report on the Examination into the Core Strategy of 2013, requires at paragraph 27 that the early review of the Core Strategy include a review of the Green Belt.</p>
Include files	

Number	Question 9
ID	LPIO15118
Full Name	Mr John Beach
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There should be no development of green land, as once it is gone it is gone forever - it cannot be brought back.
Include files	
Number	Question 9
ID	LPIO15147
Full Name	Mr David Broadley
Company / Organisation	Aylesbury Vale District Council
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Issue 2 - what is the role and function of the green belt?</p> <p>Para 5.2.3 – If the new OAN calculation method and revised NPPF lead to the need for higher than anticipated growth levels, will this lead to the need for further green belt releases to find even more capacity i.e. a new Stage 2 Green Belt Review?</p> <p>p.60 – Does the Green Belt release at Kings Langley sound plausible in NPPF Green Belt policy terms?</p>
Include files	
Number	Question 9
ID	LPIO15168
Full Name	Mr Paul Doughty
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I believe that the Green Belt land should absolutely not be de-classified. It has been set up for very good reasons and a lot of effort in the past has gone into maintaining this Green Belt, which is not just for Trings Benefit, but for the wider South East.I would be ashamed to be a

	part of the generation and process that saw widespread abandonment of the Green Belt around Tring, as once development takes place, the effects are utterly irreversible. De-classifying Green Belt, in my view, only brings benefits and advantages to speculators and property developers and no one else.
Include files	
Number	Question 9
ID	LPIO15256
Full Name	Caroline Manson
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 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>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</p> <p>No</p> <ul style="list-style-type: none"> • The Consultation underplays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting – perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.suffolk.gov.uk/sites/default/files/2017/04/BRAG%20-%20Full%20Response%20to%20the%20Stage%201%20Green%20Belt%20Review%20-%20Final%20Version.pdf • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting

	<p>point appears to be an underlying belief that current Green Belt policy is wrong.</p> <ul style="list-style-type: none"> • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been – assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO15308
Full Name	Mr Alan Conway
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 already responded to the Issues & Options Consultation. I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p>Q3&9 Support the Brag submission.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries

	<ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southcambridgeshire.gov.uk/portal/2010/08/BRAG%20Green%20Belt%20Review-undertaken-for-DBC-by-SKM-final-version.pdf). • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. • The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"
Include files	
Number	Question 9
ID	LP1015357
Full Name	Sue Wolstenholme
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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.

I am very against building on green belt and even the Mayor of London is saying that he does not want to use Green Belt land to increase housing in the capital. If this can be done in London then surely Dacorum can find a more acceptable solution for the market town of Berkhamsted and the district of Dacorum.

Standard BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
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- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations.
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town."

Include files	
Number	Question 9
ID	LPIO15403

Full Name	Paul de Hoest
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	1 The documents claim that the Green Belt is a priority as is maintaining the unique character of the market towns. These objectives are not compatible with a major housebuilding programme on the projected scale.
Include files	
Number	Question 9
ID	LPIO15419
Full Name	Nick Hanling
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 & 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>DBC's Green Belt review is flawed as any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open

	<p>areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.</p> <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.southhants.gov.uk/portal/2010/08/20100820-DBR-Analysis-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"
Include files	
Number	Question 9
ID	LPIO15467
Full Name	Sarah and Nigel Tester
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & 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.

I would like to take this opportunity emphasize some of the most important points within that response.

DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.

Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

No

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review ~~https://www.berkhamsted.gov.uk/2018/02/20/brag-responds-to-dbc-green-belt-review/~~
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken

	<p>out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do</p> <ul style="list-style-type: none"> The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO15511
Full Name	Mr Mark Rogers
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Brandon Lewis (Minister of State for Housing and Planning at the time) wrote a letter in 2016 and is attached FYI. In this he describes the Government’s support for the “strongest protection for Green Belt.” I do not believe that “very special circumstances” exist to take Green Belt destruction further. His additional statement that the Government has “been repeatedly clear that demand for housing alone will not change Green Belt Boundaries” clearly supports this objective. All details below relate directly to the historic Village of Kings Langley</p>
Include files	Brandon Lewis Letter - 20160607.pdf
Number	Question 9
ID	LPIO15523
Full Name	Miss Tanya Assarat
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 & 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>BRAG response to Question 9 (please note full document is attached to Q46)</p>

Question 9 Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

No

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review ~~(www.southcambridgeshire.gov.uk/Assets/24072013/GBR/Stage1Review/Response/Response%20to%20BRAG%20Stage%201%20Review%20July%202013.pdf)~~
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"

Include files	
Number	Question 9
ID	LPIO15572
Full Name	Melanie Llewellyn
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 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>I do not want to see any development in what is left of the Green Belt and will oppose it in every way possible</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (www.berkhamsted.gov.uk/2013/07/01/green-belt-review-2013/) • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"

Include files	
Number	Question 9
ID	LPIO15615
Full Name	M B Ridley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The right place is not the Green Belt, and indeed the communities secretary Sajid Javid has said "There is no need to build on Green Belt land"(3)
Include files	
Number	Question 9
ID	LPIO15621
Full Name	Angela and Martyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We strongly oppose any proposals which breach the Green Belt, designed to prevent urban sprawl. Several of the proposals would encourage this. Once breached, a dangerous precedent has been set. Building on Green Belt fails to protect valuable wildlife corridors and degrades important biodiversity.
Include files	
Number	Question 9
ID	LPIO15639
Full Name	Mr James Honour
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I have attended the presentation and have read the Berkhamsted Residents Action Group response to the questions posed. 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.

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 9
ID	LPIO15698
Full Name	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>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.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p>

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

	10 Housing White Paper, February 2017 11 Paragraph 80, National Planning Policy Framework (2012)
Include files	
Number	Question 9
ID	LPIO15746
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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p>

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures

	<p>that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO15793
Full Name	David Kerrigan
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 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>Green Belt is Green Belt, not Development Belt.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.bristol.gov.uk/media/2407/2017-07-10-DBC-Response-to-Stage-1-Review-09-07-17.pdf • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health

	<p>and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO15836
Full Name	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>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.</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions</p>

	<p>of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as "Grove Fields" is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO15841
Full Name	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>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.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional</u></p>

circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:
 "...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." *(Emphasis added)*

Conclusion

In conclusion, we provide the following:
 If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD

Include files	
Number	Question 9
ID	LPIO15861
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
Your response - Please add your response here	<ul style="list-style-type: none"> • In response to the question, DBLP support the Plan in undertaking a review of the green belt. Given the housing need identified in the SHMA, let alone the proposed Standardised Housing Number Methodology, there is clearly a need to

	<p>look at green field development sites. Given the extent of the green belt across the borough and the existing patterns of development, it is clear that the exceptional circumstances exist whereby land in the green belt has to be released for housing</p> <ul style="list-style-type: none"> • Case Law has made it clear that there is no sequential approach to treating the green belt in that it cannot be viewed as an area of last resort for allocations. • In terms of the approach to the review of the Green Belt, DBLP wish to raise the following points: • The Stage 1 review in 2013 is flawed insofar as the need to maintain the existing settlement pattern is not an objective of national guidance and there is no latitude in national guidance to introduce new “tests” as to how well a site performs in green belt terms • DBLP supports the ARUP Review of the green belt, as this provides the fine grain analysis of potential development options. Without such detailed analysis, it is considered that any releases proposed from the green belt would be flawed <p>It supports the identification of land parcel MY-A3 as a location to be removed from the green belt, to be allocated as per My-h2</p>
Include files	
Number	Question 9
ID	LPIO15897
Full Name	Mrs Sue Yeomans
Company / Organisation	Chilterns Countryside Group
Position	Chairman
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1 <u>2. GREEN BELT</u></p> <p>2.i. The fundamental aim of Green Belt policy remains to contain urban sprawl by keeping land permanently open; essential characteristics of Green Belts are their openness and permanence. The CCG regrets that the LP seeks to challenge and change Green Belt status in the Borough, and importantly, for the setting of the Chilterns AONB. _</p> <p>2.ii. Paragraph 80 of the National Planning Policy Framework (NPPF) sets out the 5 main purposes of the Green Belt which are: _</p> <ul style="list-style-type: none"> • <i>to check the unrestricted sprawl of large built-up areas</i>

- *to prevent neighbouring towns from merging into one another*
- *to assist in safeguarding the countryside from encroachment*
- *to preserve the setting and special character of historic towns*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

2.iii. Clearly, the Green Belt in the Borough, particularly that around Tring and Berkhamsted, currently fulfils those functions. The CCG finds no justifiable cause for those essential functions to be considered unnecessary or potentially replaceable by the development of Suitable Alternative Natural Greenspaces (SANGs).

2.iv. The NPPF has a general presumption against development in Green Belt unless this meets the very special circumstances described in paragraphs 89 and 90. Clearly, the options of the LP do not do so. Therefore the CCG does not agree with release of current Green Belt land for housing unless and until such exceptional circumstances are met.

2.v. The NPPF does allow for review of Green Belt boundaries through preparation of a Local Plan (paragraph 83) and in the exceptional circumstances described in paragraph 85. Land which is used as open space, sport and recreation is protected by the NPPF. Green Belt sites particularly on the Eastern edge of Tring support all these activities, with good public access for walking, fishing on the Grand Union Canal, riding, running and cycling, together with valuable agricultural land. Public access such as that given by Marshcroft Lane, Tring, affords a good quality outdoor experience to people with limited physical mobility.

2.vi. All residents are aware of the widespread use of cycle routes, lanes and off-road paths by visitors, particularly ramblers and cyclists, to the area. Ease of access by road and rail from London and its suburbs makes the Chilterns a popular tourist destination which is healthy for participants and supports the local economy. The large scale housing options of the LP will diminish this experience and impact negatively upon both the local and visiting communities.

2.vii. Consistent with the NPPF objectives to enhance beneficial use of the Green Belt, paragraph 81 states that once Green Belts have been defined (which they already are), Councils should plan positively to achieve this aim by providing opportunities for outdoor sport and recreation (see pt 2.iv.); retaining and enhancing landscapes, visual amenity and biodiversity; or improving damaged and derelict land. The CCG finds limited opportunities within the LP for DBC to support these aims; indeed the options for housing development would diminish the benefits of Green Belt within the Borough to the public.

2.viii. Significant wildlife corridors and habitats which have established over decades would be lost through development of Green Belt sites.

2.ix. The Group understands there is no statutory obligation from Government for Councils to release Green Belt for housing. Rather, we believe Government

	<p>calls for demonstration that housing needs can be met in other ways, eg. release of brown field sites, land banks held by developers where planning permission has been granted but not developed, increased urban density.</p> <p>2.x. Since the launch of this Consultation, both Government and the Mayor of London have publicly stated their support for the protection of Green Belt nationally and specifically around London. Indeed in his London Plan published 27.11.17. Sadiq Khan explicitly describes the Green Belt as '<i>London's lung</i>' and stresses the important contribution to this by Green Belt in Home Counties such as Hertfordshire. The CCG therefore finds DBC premature in seeking to release local Green Belt to housing, when this is not statutory Government policy, nor we believe, do the circumstances fulfil the exceptional criteria described in the NPPF.</p>
Include files	
Number	Question 9
ID	LPIO15922
Full Name	James Pitt
Company / Organisation	Gleeson Developments Limited
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We have previously identified limitations in the Stage 2 Green Belt and Landscape Assessment as regards the differential treatment of promoted sites and the relevance/applicability of conclusions relating to whole parcels to sub-areas within that wider parcel. See also related comments in our response to Question 46.
Include files	
Number	Question 9
ID	LPIO15975
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	The plan clearly sets out how the principle of Green Belt protection should be maintained whilst recognising that the scale of development needs mean that not all development can be accommodated on non-Green Belt land. Whilst the Green Belt Review is an important part of the evidence base, the selection of strategic development sites also needs to consider which locations

	can best deliver sustainable development. In some cases, sites which can deliver sustainable development are also sites which serve some Green Belt purposes. The new plan needs to clearly articulate how this tension between different policy objectives has been resolved as well as demonstrating that 'exceptional circumstances' do exist to justify removing some land from the Green Belt.
Include files	
Number	Question 9
ID	LPIO16023
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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes</p>

	<p>up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO16029
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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional</u></p>

circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:
 "...A number of possible boundary amendments...
 [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes."
 (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD

Include files	
Number	Question 9
ID	LPIO16036
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	Please find the attached document describing issues and options that I and many other residents of Tring have addressed regarding housing development Summary Section from GFRA – Executive summary As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the

	<p>evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as "<i>Grove Fields</i>" is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO16041
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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p>

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...*national policy*...", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration*...", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD 105

Include files	
Number	Question 9
ID	LPIO16051
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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p> <p>However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).</p> <p>The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so</p>

as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9
ID	LPIO16092
Full Name	Helen and Aaron Talbot
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO16105
Full Name	Helen and Aaron Talbot
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p> <p>However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).</p>

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017
11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9

ID	LPIO16143
Full Name	Helen and Aaron Talbot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the</u></p>

	<p><u>Council [DBC]</u> to establish whether any "exceptional circumstances" might exist for the proposed changes." <i>(Emphasis added)</i></p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD 105.
Include files	
Number	Question 9
ID	LPIO16150
Full Name	Stuart Mcgrory
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions</p>

	<p>of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO16164
Full Name	Stuart Mcgrory
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p>

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

	<p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO16202
Full Name	Stuart Mcgrory
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p>

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (*Emphasis added*)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (*Emphasis added*)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD 105.

Include files	
Number	Question 9
ID	LPIO16207
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	I write in regards to your "Issues and Options Consultation Local Plan to 2036".

	<p>I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO16220
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	I write in regards to your "Issues and Options Consultation Local Plan to 2036".

I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.

GFRA Response to Question 9, full document attached to question 46

We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “*exceptional circumstances*” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.

The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

	<p>It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.</p> <p>We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.</p> <p>It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO16223
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

I write in regards to your "Issues and Options Consultation Local Plan to 2036".

I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.

GFRA Response to Question 9, full document attached to question 46

In addition we note that the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...*national policy*...", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration*...", which under the law of England and

	<p>Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO16269
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>please find the attached report written on mine and other residents request.</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p>

	GFRA full document attached to question 46
Include files	
Number	Question 9
ID	LPIO16282
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>please find the attached report written on mine and other residents request.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p> <p>However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and</p>

2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

11 Paragraph 80, National Planning Policy Framework (2012)

Include files

Number	Question 9
ID	LPIO16320
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>please find the attached report written on mine and other residents request.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters</u>, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes.</u>" (Emphasis added)</p>

	<p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO16329
Full Name	Aaron Smith
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 support GFRA responses see below.</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as "Grove Fields" is clearly</p>

	<p>unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LP1016334
Full Name	Aaron Smith
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 support GFRA responses see below.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters</u>, for</p>

	<p>example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)</u></p> <p>In addition, GBR/2 concludes that it identified: "...A number of possible boundary amendments... <i>[however]</i> ...Further work should be undertaken by the Council <i>[DBC]</i> to establish whether any "exceptional circumstances" might exist for the proposed changes." <i>(Emphasis added)</i></p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO16344
Full Name	Aaron Smith
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 support GFRA responses see below.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in "<i>exceptional circumstances</i>" and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p>

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is

	<p>applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO16391
Full Name	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>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.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt</p>

Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

No

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review ~~https://www.bromley.gov.uk/brag/2013/07/01/brag-answers-to-the-2013-07-01-green-belt-review-1/~~
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"

Include files	
Number	Question 9
ID	LPIO16443
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>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO16457
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>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</p> <p>If government directives make it necessary to allocate some Green Belt land, good planning principles should be invoked to preserve those areas with greatest impact, including those acting as a transition zone between urban areas and the AONB, and those with greatest visual impact.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p> <p>However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from</p>

encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9
ID	LPIO16495
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>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's <i>"Stage 2 Green Belt Review and Landscape Appraisal – Report"</i> (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "...<i>national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's <i>"Stage 2 Green Belt Review and Landscape Appraisal – Report"</i> (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p>

	<p>"...A number of possible boundary amendments... <i>[however]</i> ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." <i>(Emphasis added)</i></p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD.105
Include files	
Number	Question 9
ID	LPIO16504
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>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation</p> <p>If government directives make it necessary to allocate some Green Belt land, good planning principles should be invoked to preserve those areas with greatest impact, including those acting as a transition zone between urban areas and the AONB, and those with greatest visual impact.</p> <p>CCG response to question 9 full document attached to question 46</p> <p>1 <u>2. GREEN BELT</u></p> <p>2.i. The fundamental aim of Green Belt policy remains to contain urban sprawl by keeping land permanently open; essential characteristics of Green Belts are their openness and permanence. The CCG regrets that the LP seeks to challenge and change Green Belt status in the Borough, and importantly, for the setting of the Chilterns AONB.</p> <p>2.ii. Paragraph 80 of the National Planning Policy Framework (NPPF) sets out the 5 main purposes of the Green Belt which are:</p>

- *to check the unrestricted sprawl of large built-up areas*
- *to prevent neighbouring towns from merging into one another*
- *to assist in safeguarding the countryside from encroachment*
- *to preserve the setting and special character of historic towns*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

2.iii. Clearly, the Green Belt in the Borough, particularly that around Tring and Berkhamsted, currently fulfils those functions. The CCG finds no justifiable cause for those essential functions to be considered unnecessary or potentially replaceable by the development of Suitable Alternative Natural Greenspaces (SANGs).

2.iv. The NPPF has a general presumption against development in Green Belt unless this meets the very special circumstances described in paragraphs 89 and 90. Clearly, the options of the LP do not do so. Therefore the CCG does not agree with release of current Green Belt land for housing unless and until such exceptional circumstances are met.

2.v. The NPPF does allow for review of Green Belt boundaries through preparation of a Local Plan (paragraph 83) and in the exceptional circumstances described in paragraph 85. Land which is used as open space, sport and recreation is protected by the NPPF. Green Belt sites particularly on the Eastern edge of Tring support all these activities, with good public access for walking, fishing on the Grand Union Canal, riding, running and cycling, together with valuable agricultural land. Public access such as that given by Marshcroft Lane, Tring, affords a good quality outdoor experience to people with limited physical mobility.

2.vi. All residents are aware of the widespread use of cycle routes, lanes and off-road paths by visitors, particularly ramblers and cyclists, to the area. Ease of access by road and rail from London and its suburbs makes the Chilterns a popular tourist destination which is healthy for participants and supports the local economy. The large scale housing options of the LP will diminish this experience and impact negatively upon both the local and visiting communities.

2.vii. Consistent with the NPPF objectives to enhance beneficial use of the Green Belt, paragraph 81 states that once Green Belts have been defined (which they already are), Councils should plan positively to achieve this aim by providing opportunities for outdoor sport and recreation (see pt 2.iv.); retaining and enhancing landscapes, visual amenity and biodiversity; or improving damaged and derelict land. The CCG finds limited opportunities within the LP for DBC to support these aims; indeed the options for housing development would diminish the benefits of Green Belt within the Borough to the public.

2.viii. Significant wildlife corridors and habitats which have established over decades would be lost through development of Green Belt sites.

	<p>point appears to be an underlying belief that current Green Belt policy is wrong.</p> <ul style="list-style-type: none"> . Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations . Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been – assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. . The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO16599
Full Name	Mrs Lorene Preston
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt is there for a reason!
Include files	
Number	Question 9
ID	LPIO16603
Full Name	Mr Mark Fowler
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt should be what it was intended to be!
Include files	
Number	Question 9
ID	LPIO16615
Full Name	Mrs J. Chapman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The words said in the Budget by Philip Hammond "continuing the strong protection of our Green Belt".
Include files	
Number	Question 9
ID	LPIO16647
Full Name	Mr Colin Riddle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We should maintain the Green Belt at all costs!!!
Include files	
Number	Question 9
ID	LPIO16675
Full Name	Katie Parsons
Company / Organisation	Historic England
Position	Historic Environment Planning Advisor
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	One of the five purposes of the Green Belt is to preserve the setting and special character of historic towns. Historic towns and former towns are situated across the

	<p>region and should form a consideration in any review of Green Belt.</p> <p>Without an appreciation of the history of the region's historic settlements and their close relationship to their surrounding landscapes, it is not possible to properly ascribe a value to the openness of the Green Belt land around them. Consideration of the value of the Green Belt requires understanding the historic significance of this open landscape.</p> <p>Whilst Green Belt reviews often divide the area into parcels of land to make the assessment exercise manageable, parcels should not be solely reviewed individually within their immediate context. It also is important to understand how collectively they achieve the strategic aims of the Green Belt.</p>
Include files	
Number	Question 9
ID	LPIO16712
Full Name	Lynsey Hillman-Gamble
Company / Organisation	Central Bedfordshire Council
Position	Strategic Plan Partnership Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Issue 2 – Whilst CBC are supportive of the retention of Green Belt land, it is essential that full consideration is given to the potential release of Green Belt land in order to accommodate the levels of growth identified within Dacorum. The Sustainable delivery of growth across the administrative area is a key factor and it is considered that exceptional circumstances would exist to release land from the Green Belt to meet your growth requirements if needed. Furthermore, if the new OAN calculation method and revised NPPF lead to the need for higher than anticipated growth levels, it is considered that this will this lead to the need for further green belt releases across a much wider area to identify appropriate capacity.</p>
Include files	
Number	Question 9
ID	LPIO16762
Full Name	Chris Graham
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 understand that we do have to build more housing and like to feel we can support the young from Tring by supplying affordable housing, but the proposal to build a total of over 2,500 houses on greenbelt land is a travesty.</p> <p>> I object strongly to the use of green belt for housing.</p>
Include files	
Number	Question 9
ID	LPIO16765
Full Name	Mrs June Gossling
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I am against taking more sites out of the green belt which should be left to safeguard the countryside.
Include files	
Number	Question 9
ID	LPIO16770
Full Name	Jennie Broome
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'm sending this email as I would like you to hear my opinion on the proposed housing developments in Bovingdon.</p> <p>There's also the issue of Green Belt. Green Belt policy was established in 1955 primarily to stop urban sprawl. I feel 'urban sprawl' will ruin this village. We want to remain a village, NOT a town!</p> <p>Conservative Manifesto stated clearly that Ministers attach great importance to the Green Belt and will maintain existing levels of protection. In March this year, the Prime Minister declared that protecting the Green Belt is 'paramount'.</p> <p>The benefits of Green Belt remain as vital as ever. By looking at other countries we can see that without the strong protection it offers against most forms of development, more valuable countryside would be</p>

	consumed by urban sprawl – and the character of our villages would be irreversibly eroded.
Include files	
Number	Question 9
ID	LPIO16775
Full Name	Ms Juliet Miller
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q.9 Green Belt - No</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> <ol style="list-style-type: none"> 1 needlessly sacrifices precious green belt <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 9
ID	LPIO16784
Full Name	Emma Duke
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 on the basis that the development of Green Belt is in direct contradiction with Dacorum's Core Strategy. Bovingdon community values it's countryside surroundings. It is part of the identity of the village and</p>

	I feel that preserving the Green Belt is of paramount importance to the village.
Include files	
Number	Question 9
ID	LPIO16803
Full Name	Jon G. Wright Dawn Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9

ID	LPIO16816
Full Name	Jon G. Wright Dawn Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p> <p>However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).</p>

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

11 Paragraph 80, National Planning Policy Framework (2012)

Include files

Number

Question 9

ID	LPIO16855
Full Name	Jon G. Wright Dawn Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes.</u>" (Emphasis added)</p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p>

	<p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD
Include files	
Number	Question 9
ID	LPIO16859
Full Name	Mr Paul Doughty
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 proposed developments all take up very large swathes of green belt land. Whilst the developers and planners say that other areas can be designated green belt in their place, this is a fundamental principle at stake. The landowners and developers who have bought green belt land at agricultural rates (when Green Belt was more sacrosanct) now stand to make a great deal of profit for themselves. It will also open the floodgates for further land speculation and development if the principle of de-classifying large swathes of Green Belt is allowed to go ahead. There have to be some clear principles invoked and very clear guidelines and rules on when Green Belt can stop being Green Belt. Not just to suit which developer puts plans forward for any area of land that they happen to own. It must also not lead to creeping development.</p>
Include files	
Number	Question 9
ID	LPIO16871
Full Name	Jan Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO16884
Full Name	Jan Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p>

GFRA Response to Question 9, full document attached to question 46

We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “*exceptional circumstances*” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.

The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably

	<p>more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.</p> <p>We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.</p> <p>It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO16922
Full Name	Jan Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings

GFRA Response to Question 9, full document attached to question 46

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...*national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman

	J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD
Include files	
Number	Question 9
ID	LPIO16925
Full Name	Ros Goodyear
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The green belt should not be compromised. Respect the need to maintain the green belt.
Include files	
Number	Question 9
ID	LPIO16959
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	Please register my support for this report by Grove Fields Residents Association. I support this whole heartedly. Summary Section from GFRA – Executive summary As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other. If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough. In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other

	<p>Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO16972
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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing</p>

in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that

	<p>could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO17010
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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p>

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (*Emphasis added*)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (*Emphasis added*)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

Include files

Number	Question 9
ID	LPIO17016
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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO17029
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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p> <p>However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).</p> <p>The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed,</p>

if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9
ID	LPIO17067
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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes.</u>" (Emphasis added)</p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which</p>

	<p>count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO17073
Full Name	Grahame Senior
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 support and endorse the views expressed in the attached document as a member of GFRA</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as "<i>Grove Fields</i>" is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues</p>

	<p>aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO17086
Full Name	Grahame Senior
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 support and endorse the views expressed in the attached document as a member of GFRA</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p>

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

	11 Paragraph 80, National Planning Policy Framework (2012)
Include files	
Number	Question 9
ID	LPIO17124
Full Name	Grahame Senior
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 support and endorse the views expressed in the attached document as a member of GFRA</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p>

	<p>"...A number of possible boundary amendments... <i>[however]</i> ...Further work should be undertaken by the Council <i>[DBC]</i> to establish whether any "exceptional circumstances" might exist for the proposed changes." <i>(Emphasis added)</i></p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO17188
Full Name	Rachel Heath
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Building on green belt land was forbidden to protect the environment and the character of towns. The new plans suggest green belt land is no longer reserved. I would urge you to keep almost all green belt land in its original state for the benefit of the environment, the health of the community and wildlife and to reduce the loss of distinct towns.
Include files	
Number	Question 9
ID	LPIO17218
Full Name	Debbie Crooks Pam Moss
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

	<p>out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do</p> <ul style="list-style-type: none"> The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO17276
Full Name	Margaret and Andrew 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>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>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to the Stage 1 Green Belt Review (www.sitesandsettlements.gov.uk/2013/07/24/brag-answers-to-the-stage-1-green-belt-review/) Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations

	<ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO17320
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other</p>

	<p>Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO17333
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>...</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p>

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

	<p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO17376
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>...</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p>

	<p>In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes.</u>" (Emphasis added)</p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "<i>...relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO17385
Full Name	Lesley Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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.

Berkhamsted Citizens Association response to question 9 below (copy of full response attached to question 46)

Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

No

- This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas.
- Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence to DBC for Stage 2 and within the full response to the Stage 1 Green Belt Review (<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-and-for-DBC-by-SKM-final-version.pdf>).
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence, this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do
- The Inspector’s report [July 2013] records “. However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town. “[para 39]

Include files	
Number	Question 9
ID	LPIO17427

Full Name	Sara Bell
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO17440
Full Name	Sara Bell

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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p> <p>However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).</p>

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017
11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9

ID	LPIO17479
Full Name	Sara Bell
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the Council [DBC] to establish whether any "exceptional</u></p>

	<p>circumstances" might exist for the proposed changes." <i>(Emphasis added)</i></p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO17486
Full Name	Emma Talbot
Company / Organisation	The Little Cloth Rabbit
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a report (GFRA) about the proposed development of Tring.</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p>

	<p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO17499
Full Name	Emma Talbot
Company / Organisation	The Little Cloth Rabbit
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a report (GFRA) about the proposed development of Tring.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p>

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures

	<p>that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p> <p>...</p>
Include files	
Number	Question 9
ID	LPIO17537
Full Name	Emma Talbot
Company / Organisation	The Little Cloth Rabbit
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a report (GFRA) about the proposed development of Tring.</p> <p>...</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's <i>"Stage 2 Green Belt Review and Landscape Appraisal – Report"</i> (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a <i>"...national policy..."</i>, under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's <i>"Stage 2 Green Belt Review and Landscape Appraisal – Report"</i> (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in <u>"exceptional circumstances"</u> and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical</p>

	<p>works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)</u></p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the Council [DBC]</u> to establish whether any "exceptional circumstances" might exist for the proposed changes." <i>(Emphasis added)</i></p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD.105
Include files	
Number	Question 9
ID	LPIO17547
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 9 below (copy of full response attached to question 46)</p> <p><i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p>

	<ul style="list-style-type: none"> • This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. • Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence to DBC for Stage 2 and within the full response to the Stage 1 Green Belt Review (http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAGA-Analysis-of-the-Green-Belt-Review-and-the-DBC-by-SKM-final-version.pdf). • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence, this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector’s report [July 2013] records “. However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town. “[para 39]
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Include files	
Number	Question 9
ID	LPIO17593
Full Name	Paul Hembury
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 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 & Development details my concerns comprehensively.</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO17606
Full Name	Paul Hembury
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

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 & Development details my concerns comprehensively.

...

Q9 – Tick NO

GFRA Response to Question 9, full document attached to question 46

We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “*exceptional circumstances*” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.

The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed,

if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9
ID	LPIO17644
Full Name	Paul Hembury
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 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 & Development details my concerns comprehensively.</p> <p>...</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard</u> to—</p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the Council [DBC]</u> to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)</p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p>

	<p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO17648
Full Name	Guinness Partnership
Company / Organisation	Guinness Partnership
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green belt reviews, when undertaken, should take a long-term (25 year) view. The Green Belt review undertaken by Arup and published in 2016 is fundamentally flawed in looking to see if Green Belt can be released in any locations, and doubly flawed in suggesting that settlements such as Markyate be 'girdled' with Green Belt to:</p> <ol style="list-style-type: none"> 1 prevent its further expansion, and 2 avoid coalescence with Slip End and Caddington <p>Both of these settlements are to the north-east of Markyate and therefore adding Green Belt to the north-west is totally ineffectual in this respect.</p> <p>The Arup plan suggests that a 6-hectare development be promoted at Markyate, within the Green Belt on land subject to the AONB designation (see Appendix 4). It would be more appropriate to develop close to the school, not 1500m away.</p> <p>In the Arup report, they produce map 6.1 showing areas for possible Green Belt expansion around Markyate. Area RA.A2 is exactly the location that should be considered for expansion of the town, as it is close to the village school and within easy walking distance of the shops. It would be madness to add this to the Green Belt.</p>

	<p>As the Local Plan states, apart from the major settlements, virtually the whole of Dacorum District is covered by either Green Belt or AONB. That being the case, there is no option other than to undertake the long-term review of Green Belt boundaries around main settlements with a view to accommodating approximately 25,000 houses within these Green Belt releases.</p> <p>A sea change in housing delivery cannot be delivered close to London unless substantial areas are removed from the Green Belt on the periphery of sustainable settlements. Major growth should be directed to where there are rail links – hence Hemel Hempstead, Berkhamsted and Tring – but a settlement such as Markyate could accommodate say 300-400 houses west of the A5 inside and outside the Green Belt. Indeed, Arup have already suggested an allocation to the south of Markyate. It is totally illogical to recommend a Green Belt site over the north-western corner of the settlement which is not Green Belt.</p>
Include files	
Number	Question 9
ID	LPIO17667
Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>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.</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions</p>

	<p>of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO17680
Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>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.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p>

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

	<p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO17718
Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>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.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p>

In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (GBR/2), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

Include files	
Number	Question 9
ID	LPIO17729
Full Name	Diana Woodward
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>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 9 below - full document attached to Question 46</p> <p><i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. • Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence to DBC for Stage 2 and within the full response to the Stage 1 Green Belt Review (http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-update-for-DBC-by-SKM-final-version.pdf). • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence, this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. • The Inspector’s report [July 2013] records “. However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town. “[para 39]
<p>Include files</p>	
<p>Number</p>	<p>Question 9</p>
<p>ID</p>	<p>LPIO17772</p>

Full Name	John and Helen Osborne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>That the Green Belt should be protected – the Government has recently reiterated that it believes that 300,000 new homes per year can be built without the need to encroach on Green Belt</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO17785
Full Name	John and Helen Osborne

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>That the Green Belt should be protected – the Government has recently reiterated that it believes that 300,000 new homes per year can be built without the need to encroach on Green Belt land</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p> <p>However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and</p>

Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

11 Paragraph 80, National Planning Policy Framework (2012)

Include files

Number	Question 9
ID	LPIO17823
Full Name	John and Helen Osborne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>That the Green Belt should be protected – the Government has recently reiterated that it believes that 300,000 new homes per year can be built without the need to encroach on Green Belt land</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard</u> to—</p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p>

	<p>"...A number of possible boundary amendments... <i>[however]</i> ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." <i>(Emphasis added)</i></p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO17830
Full Name	David and Jane Elsmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>That the Green Belt should be protected – the Government has recently reiterated that it believes that 300,000 new homes per year can be built without the need to encroach on Green Belt land</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p>

	<p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LP1017843
Full Name	David and Jane Elsmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>That the Green Belt should be protected – the Government has recently reiterated that it believes that 300,000 new homes per year can be built without the need to encroach on Green Belt land</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their</p>

brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF

	<p>provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO17881
Full Name	David and Jane Elsmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>That the Green Belt should be protected – the Government has recently reiterated that it believes that 300,000 new homes per year can be built without the need to encroach on Green Belt land</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to</u>—</p>

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides: "...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (GBR/2), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration*...", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

Include files	
Number	Question 9
ID	LPIO17888
Full Name	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>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plants for additional building in the Tring area.</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO17901
Full Name	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

Please find attached a reports commissioned by a residents association (GFRA) challenging the current plants for additional building in the Tring area.

GFRA Response to Question 9, full document attached to question 46

We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in "*exceptional circumstances*" and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.

The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

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We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9
ID	LPIO17939
Full Name	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

Please find attached a reports commissioned by a residents association (GFRA) challenging the current plants for additional building in the Tring area.

GFRA Response to Question 9, full document attached to question 46

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

	<ul style="list-style-type: none"> See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO17961
Full Name	Mr Michael Burbidge
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 9
ID	LPIO17997
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 DOCUMEMNT) , my own views can be summarised in a handful of bullet point.</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p>

	<p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LP1018010
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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their</p>

brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

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However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

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	<p>provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO18048
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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p>

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

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"...Green Belt boundaries should only be altered in exceptional circumstances..."
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"...A number of possible boundary amendments...
[however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes."
(Emphasis added)

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- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

Include files

Number

Question 9

ID

LPIO18060

Full Name

Mrs Patricia Hansard

Company / Organisation

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt land should never be used for house building.
Include files	
Number	Question 9
ID	LPIO18068
Full Name	Mr Graham Bright
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable</p>

	development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement. GFRA full document attached to question 46
Include files	
Number	Question 9
ID	LPIO18081
Full Name	Mr Graham Bright
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph</p>

80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

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As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional

	<p>circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO18119
Full Name	Mr Graham Bright
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green</u></p>

	<p><u>Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)</u></p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <u>[however] ...Further work should be undertaken by the Council [DBC]</u> to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)</p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO18125
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to</p>

	<p>encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO18138
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options,</p>

particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

	<p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO18176
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p>

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (*Emphasis added*)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (*Emphasis added*)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD 105.

Include files	
Number	Question 9
ID	LPIO18182
Full Name	Nicky and Dave Hulse
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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 Summary Section from GFRA – Executive summary

	<p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO18195
Full Name	Nicky and Dave Hulse
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken</p>

thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.

The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier

	<p>level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.</p> <p>It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO18233
Full Name	Nicky and Dave Hulse
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force</p>

from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...*national policy*...", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [*however*] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration*...", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

Include files

Number

Question 9

ID

LP1018248

Full Name	Gail Skelton
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 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>Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.skeltonsbrown.com/wp-content/uploads/2018/04/BRAG-Response-to-Stage-1-Review-17-01-18.pdf • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain

	<p>level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do</p> <ul style="list-style-type: none"> • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LP1018295
Full Name	Terry and Jennifer Elliott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other</p>

	<p>Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LP1018308
Full Name	Terry and Jennifer Elliott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p>

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

	<p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO18346
Full Name	Terry and Jennifer Elliott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p>

In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (GBR/2), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

Include files	
Number	Question 9
ID	LPIO18454
Full Name	Mrs Wendy Mclean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Not to some of it. Village boundaries should be shown then the goal posts are clear. This is the case in point with the proposed development land between Shendish

	<p>Manor and Rucklers Lane, Kings Langley. This would be considered as infilling of green belt on the Kings Langley boundary and the Local Parish had not been advised of DBC exceptional circumstances. There seems to be dancing both sides of the fence thereby deceiving the community.</p> <p>'The few areas which don't meet all of the criteria and so could have their Green Belt designation removed. This could allow planned development to then take place.' This should be clearly defined and consulted on not immersed in this mammoth Q/A session.</p>
Include files	
Number	Question 9
ID	LPIO18476
Full Name	Melanine Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting – perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.southglos.gov.uk/2017/04/11/green-belt-review-2017/ • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining

	<p>land. In essence this is what the Green Belt Review should have been – assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.</p> <ul style="list-style-type: none"> • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO18522
Full Name	Mrs Juliet Chodzko
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 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.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to the Stage 1 Green Belt Review https://www.berkhamsted.gov.uk/2013/07/24/brag-response-to-stage-1-green-belt-review/ • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations

	<ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO18569
Full Name	Captain Andrew Cassels
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 entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to the Stage 1 Green Belt Review https://www.berkhamsted.gov.uk/2467/Green-Belt-Review-Response Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.

	<ul style="list-style-type: none"> • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO18615
Full Name	Lindy Weinreb
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>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas • Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence to DBC for Stage 2 and within the full response to the Stage 1 Green Belt Review (http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-and-the-DBC-by-SKM-final-version.pdf).

	<ul style="list-style-type: none"> • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence, this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector’s report [July 2013] records “. However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town. “[para 39]
Include files	
Number	Question 9
ID	LPIO18662
Full Name	Hilary Abbott
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 & 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>Q3 & Q9. DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before</p>

considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

No

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review ~~https://www.buckinghamshire.gov.uk/media/246720/Stage-1-Green-Belt-Review-Response-2013-14.pdf~~
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"

Include files	
Number	Question 9

ID	LPIO18708
Full Name	Paul and Gillian Jenkins
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 & 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, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.berkhamsted.gov.uk/2017/04/16/green-belt-review-2017/ • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations

	<ul style="list-style-type: none"> Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO18754
Full Name	Berkhamsted Citizens
Company / Organisation	Berkhamsted Citizens
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence to DBC for Stage 2 and within the full response to the Stage 1 Green Belt Review (http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-and-for-DBC-by-SKM-final-version.pdf). Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong

	<ul style="list-style-type: none"> • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence, this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector’s report [July 2013] records “. However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town. “[para 39]
Include files	
Number	Question 9
ID	LPIO18801
Full Name	Lyndsay Slater
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 & 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>Q3 & Q9. DBC’s Green Belt review is flawed and BRAG’s analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be</p>

destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

No

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review ~~https://www.buckingham.gov.uk/2018/04/16/brag-answers-questions-2018-04-16/~~
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"

Include files	
Number	Question 9
ID	LPIO18850
Full Name	Andrew and Margit Dobbie
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 & 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>Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review It would have been good to have a full Green Belt Review of the village • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove

	<p>impact on character of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO18961
Full Name	Mrs Emma Robertson
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p>

	<p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO18974
Full Name	Mrs Emma Robertson
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any</p>

consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance

	<p>Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO19037
Full Name	Barbara Gainsley
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 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"> • This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. • Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence to DBC for Stage 2 and within the full response to the Stage 1 Green Belt Review • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour

	<p>of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.</p> <ul style="list-style-type: none"> • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence, this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. • The Inspector’s report [July 2013] records “. However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town. “[para 39]
Include files	
Number	Question 9
ID	LPIO19076
Full Name	Mrs Emma Robertson
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p>

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...*national policy*...", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration*...", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD.105

Include files	
Number	Question 9
ID	LPIO19081
Full Name	Bill Ahearn

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 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</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; putting the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO19094
Full Name	Bill Ahearn
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 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</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p> <p>However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).</p> <p>The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not</p>

considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017
11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9
ID	LPIO19128
Full Name	Bill Ahearn
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 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</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes.</u>" (Emphasis added)</p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision</p>

	<p>would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LP1019139
Full Name	Ms Sarah Hain
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes</p>

	<p>up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO19152
Full Name	Ms Sarah Hain
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not</p>

possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of

	<p>agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO19190
Full Name	Ms Sarah Hain
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p>

	<p>In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)</p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO19197
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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

	<p>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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO19210
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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.

GFRA Response to Question 9, full document attached to question 46

We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “*exceptional circumstances*” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.

The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably

	<p>more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.</p> <p>We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.</p> <p>It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO19248
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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.

GFRA Response to Question 9, full document attached to question 46

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the

	principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO19254
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning</p>

	<p>balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	

Number	Question 9
ID	LPIO19267
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the</p>

methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green

	<p>Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO19304
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p>

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (*Emphasis added*)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (*Emphasis added*)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

Include files	
Number	Question 9
ID	LPIO19321
Full Name	Stuart, Miranda & Melissa Kay
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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.

Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.

BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

No

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review ~~(www.planningportal.co.uk/brag/brag-reviews/brag-1)~~
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and

	therefore more weight should be attached to securing sustainable growth in the Borough's main town"
Include files	
Number	Question 9
ID	LPIO19368
Full Name	Wai Tang and Greg Barfoot
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 note we are aware that 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, 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>Q3 & Q9. DBC's Green Belt review is flawed and BRAG's analysis has been ignored. Any adjustments in Green Belt should have been completed before considering sites. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.berkhamsted.gov.uk/Document/Download/19368 • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.

	<ul style="list-style-type: none"> • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO19417
Full Name	Philippa Jones
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 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>Question 9</p> <p><i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas.

	<p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO19472
Full Name	John Wignall
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 would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p>

The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive

	<p>sites to the west of Tring and the less sensitive sites to the north and south.</p> <p>It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO19510
Full Name	John Wignall
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 would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p>

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...*national policy*...", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration*...", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD.105

Include files	
Number	Question 9
ID	LPIO19516
Full Name	Kevin Cullen

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 refer to the attached report.(BRAG)</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO19529
Full Name	Kevin Cullen
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 refer to the attached report.(BRAG)</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p> <p>However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).</p> <p>The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.</p> <p>Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.</p>

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9
ID	LPIO19567
Full Name	Kevin Cullen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please refer to the attached report.(BRAG)

GFRA Response to Question 9, full document attached to question 46

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman

	J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD.105
Include files	
Number	Question 9
ID	LPIO19573
Full Name	Mark Lawson and Sharon Wilkie
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable</p>

	development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement. GFRA full document attached to question 46
Include files	
Number	Question 9
ID	LPIO19587
Full Name	Mark Lawson and Sharon Wilkie
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works</p>

undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

	<p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO19625
Full Name	Mark Lawson and Sharon Wilkie
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing</p>

	<p>them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)</u></p> <p>In addition, GBR/2 concludes that it identified: "...A number of possible boundary amendments... <i>[however]</i> ...Further work should be undertaken by the Council <i>[DBC]</i> to establish whether any "exceptional circumstances" might exist for the proposed changes." <i>(Emphasis added)</i></p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD.105
Include files	
Number	Question 9
ID	LPIO19630
Full Name	Vivienne 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>Q9 – Tick NO</p> <p>Summary Section from GFRA – Executive summary</p>

	<p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as "<i>Grove Fields</i>" is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO19643
Full Name	Vivienne 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>GFRA Response to Question 9, full document attached to question 46</p>

We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “*exceptional circumstances*” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.

The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

	<p>We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.</p> <p>It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO19681
Full Name	Vivienne 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</p>

in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need

GFRA Response to Question 9, full document attached to question 46

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the

	principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD.105
Include files	
Number	Question 9
ID	LPIO19690
Full Name	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>Q9 – Tick NO</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues</p>

	<p>aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO19703
Full Name	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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in</p>

our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning

	<p>balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO19740
Full Name	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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate</u></p>

	<p><u>to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)</u></p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)</p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...relevant consideration...", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD.105
Include files	
Number	Question 9
ID	LPIO19756
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>Question 9</p> <p><i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas.

	<p>address the severe lack of investment in supporting infrastructure.</p> <p>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.</p> <p>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 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.</p>
Include files	
Number	Question 9
ID	LP1019812
Full Name	Jon Esson
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 a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p>

	<p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as "<i>Grove Fields</i>" is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO19825
Full Name	Jon Esson
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 a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in "<i>exceptional circumstances</i>" and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long</p>

standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive

	<p>boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO19863
Full Name	Jon Esson
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 a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p>

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides: "...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (GBR/2), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...relevant consideration...", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

Include files	
Number	Question 9
ID	LPIO19896
Full Name	Chris Smith
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO19909
Full Name	Chris Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

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 9, full document attached to question 46

We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in "*exceptional circumstances*" and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.

The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

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As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9
ID	LPIO19947
Full Name	Chris Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

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 9, full document attached to question 46

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

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"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

	<ul style="list-style-type: none"> See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO19953
Full Name	mrs sue van rhee
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p>

	GFRA full document attached to question 46
Include files	
Number	Question 9
ID	LPIO19966
Full Name	mrs sue van rhee
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph</p>

80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional

	<p>circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO20004
Full Name	mrs sue van rhee
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard</u> to—</p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances</u>..." (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for</p>

	<p>example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)</u></p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the Council [DBC]</u> to establish whether any "exceptional circumstances" might exist for the proposed changes." <i>(Emphasis added)</i></p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO20010
Full Name	Kate and Ben Marston
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified</p>

	<p>the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO20023
Full Name	Kate and Ben Marston
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long</p>

standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive

	<p>boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO20061
Full Name	Kate and Ben Marston
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p>

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...*national policy*...", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration*...", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

Include files	
Number	Question 9
ID	LPIO20067
Full Name	Maurice and Christine O'Keefe

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LP1020080
Full Name	Maurice and Christine O'Keefe
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p> <p>However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).</p> <p>The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore</p>

the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017
11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9
ID	LPIO20117
Full Name	Maurice and Christine O'Keefe
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard</u> to—</p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the Council [DBC]</u> to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)</p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development</p>

	<p>without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO20124
Full Name	Sherry and Haydn Bond
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as "Grove Fields" is clearly</p>

	<p>unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO20137
Full Name	Sherry and Haydn Bond
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to</p>

unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

	<p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO20176
Full Name	Sherry and Haydn Bond
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard</u> to—</p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances</u>..." (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the</u></p>

	<p>authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)</u></p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...Further work should be undertaken by the Council <i>[DBC]</i> to establish whether any "exceptional circumstances" might exist for the proposed changes." <i>(Emphasis added)</i></p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO20182
Full Name	Dianne Pilkington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>

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.

Thank you

Summary Section from GFRA – Executive summary

As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.

If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.

In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.

In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as "*Grove Fields*" is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.

GFRA full document attached to question 46

Include files	
Number	Question 9
ID	LPIO20195
Full Name	Dianne Pilkington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

To whom it may concern,

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:

The schools cannot cope in particular the Secondary school which is already needing to expand to accommodate children already in Tring.

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.

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.

Thank you

GFRA Response to Question 9, full document attached to question 46

We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in "*exceptional circumstances*" and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.

The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration

of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9
ID	LPIO20232
Full Name	Dianne Pilkington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's <i>"Stage 2 Green Belt Review and Landscape Appraisal – Report"</i> (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a <i>"...national policy..."</i>, under the Section 19 (2)(a) above, provides:</p> <p><i>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>"</i> (Emphasis added)</p> <p>In this context the DBC's <i>"Stage 2 Green Belt Review and Landscape Appraisal – Report"</i> (GBR/2), at Page 140, provides:</p> <p><i>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in <u>"exceptional circumstances"</u> and considered through the preparation</i></p>

of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." *(Emphasis added)*

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD

Include files	
Number	Question 9
ID	LPIO20243
Full Name	Mr Peter Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I have seen the submission to DBC by the Berkhamsted Residents Action Group (BRAG), the contents of which I support. BRAG response to Question 9 (please note full document is attached to Q46)

Question 9 Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

No

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review ~~(www.dorset.gov.uk/2487/Green-Belt-Review-FAQ.html)~~
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"

Include files	
Number	Question 9
ID	LPIO20285
Full Name	David Clarke
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as "<i>Grove Fields</i>" is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	

Number	Question 9
ID	LP1020298
Full Name	David Clarke
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in "<i>exceptional circumstances</i>" and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p>

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures

	<p>that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO20336
Full Name	David Clarke
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p>

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:
 "...Green Belt boundaries should only be altered in exceptional circumstances..."
(Emphasis added)

In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." *(Emphasis added)*

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments...
[however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes."
(Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

Include files	
Number	Question 9
ID	LPIO20343
Full Name	Deborah Turnbull
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO20356
Full Name	Deborah Turnbull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

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.

GFRA Response to Question 9, full document attached to question 46

We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in "*exceptional circumstances*" and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.

The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

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However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017

11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9
ID	LPIO20394
Full Name	Deborah Turnbull
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes.</u>" (Emphasis added)</p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "<i>...relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p>

	<ul style="list-style-type: none"> See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD
Include files	
Number	Question 9
ID	LPIO20404
Full Name	Jane Collis
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 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>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.salisbury.gov.uk/2018/04/16/brag-green-belt-review-response/ Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review

	<p>should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do</p> <ul style="list-style-type: none"> • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO20451
Full Name	Mr David Parker
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p>

	<p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO20465
Full Name	Mr David Parker
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any</p>

consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance

	<p>Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO20504
Full Name	Mr David Parker
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p>

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (GBR/2), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration*...", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD

Include files	
Number	Question 9
ID	LPIO20513
Full Name	DR Brigitta Case
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 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 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.</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>Green Belt</p> <p>This is land labelled as such for a reason. The Government has time and again promised and stated that it should only be built on in exceptional circumstances. We border on areas of outstanding beauty here in the Chilterns. To find space for any housing proposal in this plan other than 1B will mean using nearly all the Green field sites listed if I have understood correctly. Wildlife will be impacted. Connecting these areas to existing roads will cause congestion to a degree that will bring parts of Berkhamsted to a standstill. We already have a recognised shortage of open Green spaces in Berkhamsted, so the loss of any green field before other options have been fully explored seems to be a travesty</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.berkhamsted.gov.uk/2017/04/16/brag-response-to-stage-1-green-belt-review/ • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.

- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do
- The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”

Berkhamsted Citizens response

Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

No

- This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas
- Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence to DBC for Stage 2 and within the full response to the Stage 1 Green Belt Review (<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-and-for-DBC-by-SKM-final-version.pdf>).
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites

	<p>regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence, this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do</p> <ul style="list-style-type: none"> • The Inspector’s report [July 2013] records “. However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town. “[para 39]
Include files	
Number	Question 9
ID	LPIO20560
Full Name	Christine Manning
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 would like to support the views put forward by the Berkhamsted Citizens Association in their response to the Core Strategy</p> <p><i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas • Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence to DBC for Stage 2 and within the full response to the Stage 1 Green Belt Review (http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analyse-of-the-Green-Belt-Review-and-its-impact-for-DBC-by-SKM-final-version.pdf). • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong

	<ul style="list-style-type: none"> • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence, this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector’s report [July 2013] records “. However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town. “[para 39]
Include files	
Number	Question 9
ID	LPIO20602
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	<p>As a landowner, HCC supports the approach to the selection of Green Belt sites and the DBC approach which has sought to sieve the sites to identify those which do not make a contribution to all of the purposes of Green belt. However, we do believe that Stage 2 Green Belt and Landscape review should be further interrogated to ensure that its conclusions are robust.</p> <p>In particular, we support the identification of the need to marry the conclusions of the Green belt review with the sustainability of the sites, and their ability to provide the necessary infrastructure which development of them would involve, as set out at 5.2.6 of the Issues and Options consultation.</p> <p>The interrelationship between these factors is set out in the separate response to the Call for Sites 2017 for both Dunsley Farm and Wayside Farm.</p>
Include files	

Number	Question 9
ID	LP1020619
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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LP1020632

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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p> <p>To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.</p> <p>If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.</p> <p>However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).</p>

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.

As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.

10 Housing White Paper, February 2017
11 Paragraph 80, National Planning Policy Framework (2012)

Include files	
Number	Question 9

ID	LPIO20670
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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard</u> to—</p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p> <p>In this context the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...<u>Further work should be undertaken by the Council [DBC]</u> to establish whether any "exceptional</p>

	<p>circumstances" might exist for the proposed changes." <i>(Emphasis added)</i></p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO20675
Full Name	Keiron Wybrow
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 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>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other</p>

	<p>Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO20688
Full Name	Keiron Wybrow
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.</p>

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.

	<p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LP1020726
Full Name	Keiron Wybrow
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 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>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p>

In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (GBR/2), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

Include files	
Number	Question 9
ID	LPIO20736
Full Name	Christopher Townsend
Company / Organisation	
Position	Councillor, Tring Town Council
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<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>There is confusion on the Government's position with regard to the Green Belt and what constitutes 'exceptional circumstances'. A recent statement said no houses would be built on Green Belt</p> <p>Paragraph 5.2.4 in the Issues & Options Local Plan implies that failure to meet one of the Government's criteria* is sufficient to remove the land in question from the Green Belt.</p> <p>This is unacceptable as the contribution made under certain criteria could be exceptional e.g. to preserve the setting and special character of historic towns whilst weak in another. Clarity should be given to what justifies removal of Green Belt status before considering locations.</p> <p>Paragraph 5.2.6 as worded appears to relegate the status of Green Belt land is assessing the suitability of a location for development. A site should have to fail a threshold test in terms of its contribution as Green Belt before these further considerations come into play.</p> <p>For example the Stage 2 Green Belt Review recommendations for sites Tr-h1 and Tr-h6 be retained as Green Belt.</p> <p>* <i>The National Planning Policy Framework:</i> "80. Green Belt serves five purposes:</p> <ul style="list-style-type: none"> • to check the unrestricted sprawl of large built-up areas; • to prevent neighbouring towns merging into one another; • to assist in safeguarding the countryside from encroachment; • to preserve the setting and special character of historic towns; and • to assist in urban regeneration, by encouraging the recycling of derelict and other urban land"
Include files	
Number	Question 9
ID	LPIO20784
Full Name	Usha Kilich
Company / Organisation	Northchurch Parish Council
Position	Parish Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt should prevent urban sprawl and create open spaces between built up areas.
Include files	
Number	Question 9

ID	LPIO20830
Full Name	Mr Iain Manson
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 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>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.berkhamsted.gov.uk/2013/07/24/brag-answers-to-the-2013-green-belt-review/ • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for

	example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"
Include files	
Number	Question 9
ID	LPIO20876
Full Name	Mrs. Sue 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>I welcome the opportunity to contribute to the Dacorum Borough Council's (DBC) consultation on Issues & Options Local Plan to 2036 and request that my comments below are fully taken into account in further deliberations on the Local Plan.</p> <p>Whilst I have given detail on some issues below, I totally support the response made by the Chiltern Countryside Group (CCG), which gives further comment on these key matters. Please refer to the CCG submission for my full response.</p> <ol style="list-style-type: none"> 1 1. I am strongly against Green Belt which meets NPPF criteria being released for housing development within the Borough. 1 I do not find that DBC has fully explored all alternative options to avoid development of Green Belt. These may, but wholly include, statutory co-operation with adjoining Local Authorities on housing needs, which seems sorely lacking; brown field sites; land held by developers where planning permission has been granted but not taken up; higher urban densities. <p>Additionally, I refer DBC to the obligations set out in paragraphs 80, 85, 89 and 90 of the NPPF regarding status and protection of Green Belt. I don't find the Local Plan meets those obligations.</p> <p>Chiltern Conservation Group response below</p> <ol style="list-style-type: none"> 1 2. GREEN BELT <p>2.i. The fundamental aim of Green Belt policy remains to contain urban sprawl by keeping land permanently open; essential characteristics of Green Belts are their openness and permanance. The CCG regrets that the LP seeks to challenge and change Green Belt status in the Borough, and importantly, for the setting of the Chilterns AONB. _</p> <p>2.ii. Paragraph 80 of the National Planning Policy Framework (NPPF) sets out the 5 main purposes of the Green Belt which are: _</p>

- *to check the unrestricted sprawl of large built-up areas*
- *to prevent neighbouring towns from merging into one another*
- *to assist in safeguarding the countryside from encroachment*
- *to preserve the setting and special character of historic towns*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

2.iii. Clearly, the Green Belt in the Borough, particularly that around Tring and Berkhamsted, currently fulfils those functions. The CCG finds no justifiable cause for those essential functions to be considered unnecessary or potentially replaceable by the development of Suitable Alternative Natural Greenspaces (SANGs).

2.iv. The NPPF has a general presumption against development in Green Belt unless this meets the very special circumstances described in paragraphs 89 and 90. Clearly, the options of the LP do not do so. Therefore the CCG does not agree with release of current Green Belt land for housing unless and until such exceptional circumstances are met.

2.v. The NPPF does allow for review of Green Belt boundaries through preparation of a Local Plan (paragraph 83) and in the exceptional circumstances described in paragraph 85. Land which is used as open space, sport and recreation is protected by the NPPF. Green Belt sites particularly on the Eastern edge of Tring support all these activities, with good public access for walking, fishing on the Grand Union Canal, riding, running and cycling, together with valuable agricultural land. Public access such as that given by Marshcroft Lane, Tring, affords a good quality outdoor experience to people with limited physical mobility.

2.vi. All residents are aware of the widespread use of cycle routes, lanes and off-road paths by visitors, particularly ramblers and cyclists, to the area. Ease of access by road and rail from London and its suburbs makes the Chilterns a popular tourist destination which is healthy for participants and supports the local economy. The large scale housing options of the LP will diminish this experience and impact negatively upon both the local and visiting communities.

2.vii. Consistent with the NPPF objectives to enhance beneficial use of the Green Belt, paragraph 81 states that once Green Belts have been defined (which they already are), Councils should plan positively to achieve this aim by providing opportunities for outdoor sport and recreation (see pt 2.iv.); retaining and enhancing landscapes, visual amenity and biodiversity; or improving damaged and derelict land. The CCG finds limited opportunities within the LP for DBC to support these aims; indeed the options for housing development would diminish the benefits of Green Belt within the Borough to the public.

2.viii. Significant wildlife corridors and habitats which have established over decades would be lost through development of Green Belt sites.

	<p>2.ix. The Group understands there is no statutory obligation from Government for Councils to release Green Belt for housing. Rather, we believe Government calls for demonstration that housing needs can be met in other ways, eg. release of brown field sites, land banks held by developers where planning permission has been granted but not developed, increased urban density.</p> <p>2.x. Since the launch of this Consultation, both Government and the Mayor of London have publicly stated their support for the protection of Green Belt nationally and specifically around London. Indeed in his London Plan published 27.11.17. Sadiq Khan explicitly describes the Green Belt as '<i>London's lung</i>' and stresses the important contribution to this by Green Belt in Home Counties such as Hertfordshire. The CCG therefore finds DBC premature in seeking to release local Green Belt to housing, when this is not statutory Government policy, nor we believe, do the circumstances fulfil the exceptional criteria described in the NPPF.</p>
Include files	
Number	Question 9
ID	LPIO20906
Full Name	Mr Jake Storey
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 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>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.planningportal.co.uk/media/2018/02/20/BRAG-Response-to-Stage-1-Green-Belt-Review-17-02-18.pdf • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting

	<p>point appears to be an underlying belief that current Green Belt policy is wrong.</p> <ul style="list-style-type: none"> • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO20961
Full Name	Mr & Mrs J.D Battye
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 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>Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided.</p> <p>Both stages of the Green Belt Review are flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review http://www.southchamsted.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf</p> <p>Previous conclusions on the important role of the Green Belt by a series of Planning Inspectors have been ignored in favour of the Green Belt Reviews produced by consultants whose starting point appears to be an assumption that current Green Belt policy is wrong.</p> <p>We strongly agree with 5.2.6 about the need to consider the sustainability of proposed sites</p> <ul style="list-style-type: none"> • infrastructure, accessibility, health and well-being issues are all crucial. Consideration of the impact on the character of each town or village is also We note the Inspector's Report to Dacorum Borough Council [PINS/A1910/429/4, July 2013] which states, with reference to Market Towns, "...However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town". [para 39]
Include files	
Number	Question 9
ID	LPIO21033
Full Name	julie owen
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 attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt</p>

	<p>locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO21046
Full Name	julie owen
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 attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White</p>

Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and

	<p>further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO21084
Full Name	julie owen
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 attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p> <p>"In preparing a local development document the local planning authority <u>must have regard to—</u></p> <p><i>(a) national policies and advice contained in guidance issued by the Secretary of State...</i>" (Emphasis added)</p> <p>Specifically, Paragraph 83 of the NPPF, a "<i>...national policy...</i>", under the Section 19 (2)(a) above, provides:</p> <p>"...Green Belt boundaries should only be altered in <u>exceptional circumstances...</u>" (Emphasis added)</p>

	<p>In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (GBR/2), at Page 140, provides:</p> <p>"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "<u>exceptional circumstances</u>" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as <u>the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities</u> on broad strategic matters, for example housing targets or requirements for infrastructure. <u>Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels...</u>" (Emphasis added)</p> <p>In addition, GBR/2 concludes that it identified:</p> <p>"...A number of possible boundary amendments... <i>[however]</i> ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)</p> <p><u>Conclusion</u></p> <p>In conclusion, we provide the following:</p> <p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD105
Include files	
Number	Question 9
ID	LPIO21098
Full Name	Sheron Wilkie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please find attached report regarding your proposed development in Tring as submission opposing this proposal. (GFRA)

	<p>Summary Section from GFRA – Executive summary</p> <p>As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.</p> <p>If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.</p> <p>In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.</p> <p>In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “<i>Grove Fields</i>” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 9
ID	LPIO21111
Full Name	Sheron Wilkie
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 attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in “<i>exceptional circumstances</i>” and the approach taken</p>

thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.

The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.

It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier

	<p>level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.</p> <p>It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i></p> <p><i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO21149
Full Name	Sheron Wilkie
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 attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p>GFRA Response to Question 9, full document attached to question 46</p> <p>In addition we note that the DBC's "<i>Stage 2 Green Belt Review and Landscape Appraisal – Report</i>" (GBR/2) refers to the NPPF. The NPPF obtains its legal force</p>

from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...*national policy*...", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [*however*] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration*...", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

Include files

Number

Question 9

ID	LPIO21157
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	No
Your response - Please add your response here	<ul style="list-style-type: none"> • SADBDF are aware of the significant constraint applied by the Green Belt surrounding the largest settlements within the Borough; the evidence base supporting the Plan, particularly the SHLAA, provides the urban capacity assumptions given for each settlement. While this confirms that substantial levels of development can be provided within existing urban areas, it is not clear whether all sites identified will be deliverable; but even so, it is entirely clear that the needs for the borough cannot be met within the urban areas alone. As such, this constitutes the exceptional circumstances to warrant the release of sites from the Green Belt to meet future needs. There is justification for release of Green Belt land to allow for allocation of sites for housing to 2036 • SADBDF supports the Housing White Paper checklist for considerations before making changes to Green Belt boundaries: <ul style="list-style-type: none"> • making best use of brownfield sites and supporting their regeneration; • making best use of land which is currently underused, including land owned by the public sector; • maximising the density at which new development is built; and • exploring whether any other Councils can help meet some of our local needs • As noted earlier in these representations, there is not a view at present to look to meet Dacorum's needs outside of the district. Therefore, it is appropriate for Green Belt sites to be considered. As the Green Belt is tightly drawn around the three main settlements, the most sustainable pattern of development will necessarily require Green Belt release; however, the Plan fails to consider whether development at the Rural Area Beyond the Green Belt can contribute to meeting housing needs. • SADBDF have a specific interest in Land at Long Marston, referenced within the SHLAA as site TW/6. SADBDF suggest extensive work is undertaken to establish infrastructure requirements that could prevent the delivery of sites considered in the Plan, particularly for large scale Green Belt sites. Sites such as TW/6 can be brought forward with very limited infrastructure requirements, so can deliver housing within the early stages of the Plan

Include files	
Number	Question 9
ID	LPIO21187
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Central Government's policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <ul style="list-style-type: none"> • The Plan under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.berkhamsted.gov.uk/wp-content/uploads/2016/06/BRAG-Response-to-the-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf) supported by Berkhamsted Town Council. • Previous conclusions on Green Belt by a series of Planning Inspectors have now been ignored in favour of the questionable Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong • Strongly agree with 5.2.6 about the need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues are all crucial. Consideration of impact on character of the town or village is fundamental to safeguard it for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the If these discrete sites are already developed to a certain level, then consideration can be taken to remove them from

	<p>Green Belt using their edge as the new boundary - in order to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been – assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but it noticeably failed to do.</p> <ul style="list-style-type: none"> • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town” • I strongly support the Chiltern Countryside Group’s submission regarding the Green Belt and AONB and their assertion that “The CCG finds no justifiable cause for those essential functions [of the Green Belt] to be considered unnecessary or potentially replaceable by the development of Suitable Alternative Natural Greenspaces (SANGs)” (see separate submissions)
Include files	
Number	Question 9
ID	LPIO21280
Full Name	Sarah Lightfoot
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 strongly support the Chiltern Countryside Group’s submission regarding the Green Belt and AONB (below)</p> <p>1 <u>2. GREEN BELT</u></p> <p>2.i. The fundamental aim of Green Belt policy remains to contain urban sprawl by keeping land permanently open; essential characteristics of Green Belts are their openness and permanence. The CCG regrets that the LP seeks to challenge and change Green Belt status in the Borough, and importantly, for the setting of the Chilterns AONB. _</p> <p>2.ii. Paragraph 80 of the National Planning Policy Framework (NPPF) sets out the 5 main purposes of the Green Belt which are: _</p> <ul style="list-style-type: none"> • <i>to check the unrestricted sprawl of large built-up areas</i> • <i>to prevent neighbouring towns from merging into one another</i> • <i>to assist in safeguarding the countryside from encroachment</i> • <i>to preserve the setting and special character of historic towns</i>

- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

2.iii. Clearly, the Green Belt in the Borough, particularly that around Tring and Berkhamsted, currently fulfils those functions. The CCG finds no justifiable cause for those essential functions to be considered unnecessary or potentially replaceable by the development of Suitable Alternative Natural Greenspaces (SANGs).

2.iv. The NPPF has a general presumption against development in Green Belt unless this meets the very special circumstances described in paragraphs 89 and 90. Clearly, the options of the LP do not do so. Therefore the CCG does not agree with release of current Green Belt land for housing unless and until such exceptional circumstances are met.

2.v. The NPPF does allow for review of Green Belt boundaries through preparation of a Local Plan (paragraph 83) and in the exceptional circumstances described in paragraph 85. Land which is used as open space, sport and recreation is protected by the NPPF. Green Belt sites particularly on the Eastern edge of Tring support all these activities, with good public access for walking, fishing on the Grand Union Canal, riding, running and cycling, together with valuable agricultural land. Public access such as that given by Marshcroft Lane, Tring, affords a good quality outdoor experience to people with limited physical mobility.

2.vi. All residents are aware of the widespread use of cycle routes, lanes and off-road paths by visitors, particularly ramblers and cyclists, to the area. Ease of access by road and rail from London and its suburbs makes the Chilterns a popular tourist destination which is healthy for participants and supports the local economy. The large scale housing options of the LP will diminish this experience and impact negatively upon both the local and visiting communities.

2.vii. Consistent with the NPPF objectives to enhance beneficial use of the Green Belt, paragraph 81 states that once Green Belts have been defined (which they already are), Councils should plan positively to achieve this aim by providing opportunities for outdoor sport and recreation (see pt 2.iv.); retaining and enhancing landscapes, visual amenity and biodiversity; or improving damaged and derelict land. The CCG finds limited opportunities within the LP for DBC to support these aims; indeed the options for housing development would diminish the benefits of Green Belt within the Borough to the public.

2.viii. Significant wildlife corridors and habitats which have established over decades would be lost through development of Green Belt sites.

2.ix. The Group understands there is no statutory obligation from Government for Councils to release Green Belt for housing. Rather, we believe Government calls for demonstration that housing needs can be met in other ways, eg. release of brown field sites, land banks held by developers where planning permission has been granted but not developed, increased urban density.

	2.x. Since the launch of this Consultation, both Government and the Mayor of London have publicly stated their support for the protection of Green Belt nationally and specifically around London. Indeed in his London Plan published 27.11.17. Sadiq Khan explicitly describes the Green Belt as ' <i>London's lung</i> ' and stresses the important contribution to this by Green Belt in Home Counties such as Hertfordshire. The CCG therefore finds DBC premature in seeking to release local Green Belt to housing, when this is not statutory Government policy, nor we believe, do the circumstances fulfil the exceptional criteria described in the NPPF.
Include files	
Number	Question 9
ID	LPIO21310
Full Name	Antony Harbidge
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 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>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review https://www.planningportal.co.uk/media/2017/04/13/BRAGs-Response-to-DBC-Review-of-GBS-17-18.pdf • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.

	<ul style="list-style-type: none"> • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO21356
Full Name	Helen Kington
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 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>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p>

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review [https://www.brag.org.uk/2013/07/01/gbr-stage-1-review-100-days-on/](#)
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do
- The Inspector's report [July 2013] records "it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town"

Include files

Number	Question 9
ID	LPIO21402
Full Name	James Good
Company / Organisation	Angle Property Limited
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><i>Question 9: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p><u>Response:</u> Yes</p> <p><u>Details:</u> The review of the Green Belt that has been undertaken on behalf of the Council has identified some sites that no longer meet the objectives of the Green Belt. Land that no longer meets the objectives of the Green Belt should be removed from it as a matter of principle.</p> <p>The removal of these areas from the Green Belt designation, and allocation of them for appropriate development, will ensure that it is able to meet the needs of that part of the district, and reduce pressure for such development elsewhere. This will ensure that the purpose and credibility of the remaining Green Belt is maintained.</p>
Include files	
Number	Question 9
ID	LPIO21417
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>1.10.1 The Landowners are aware of the significant constraint applied by the Green Belt surrounding the largest settlements within the Borough; the evidence base supporting The Plan, particularly the SHLAA provides the urban capacity assumptions given for each settlement. While this confirms that substantial levels of development can be provided within existing urban areas; it is not clear whether all sites identified will be deliverable; but even so, it is entirely clear that the needs for the borough cannot be met within the urban areas alone. As such, this constitutes the exceptional circumstances to warrant the release of sites from the Green Belt to meet future needs. There is justification</p>

	<p>for release of Green Belt land to allow for allocation of sites for housing to 2036</p> <p>1.10.2 The Landowners support the Housing White Paper checklist for considerations before making changes to Green Belt boundaries:</p> <ul style="list-style-type: none"> • making best use of brownfield sites and supporting their regeneration; • making best use of land which is currently underused, including land owned by the public sector; • maximising the density at which new development is built; and • exploring whether any other Councils can help meet some of our local needs <p>2.1.1 As noted earlier in these representations; there is not a view at present to look to meet Dacorum's needs outside of the district; therefore, it is appropriate for Green Belt sites to be considered. As the Green Belt is tightly drawn around the three main settlements, the most sustainable pattern of development will necessarily require Green Belt release, including at Markyate.</p> <p>2.1.2 This representation is accompanied by a Call for Sites submission at Appendix 2 which includes a detailed review of the proposed site in Markyate in terms of its contribution towards the Green Belt to enable a robust comparative assessment to be made to meet the requirements of paragraph 84 and 85 of the NPPF.</p>
Include files	
Number	Question 9
ID	LPIO21444
Full Name	Majesticare Limited
Company / Organisation	Majesticare Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>22. Almost 85% of the borough is rural, with 60% of this area designated as Green Belt. The overall purpose of the Green Belt is to keep a sense of openness between built up areas and protecting the countryside from development, which we broadly welcome and support.</p> <p>23. Paragraph 85 of the Framework states that Local Planning Authorities should not include land within the defining boundaries of the Green Belt which is it necessary to keep permanently open, and define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.</p> <p>24. The site at Spring Garden Lane is located within the Green Belt. However it is in close proximity to some light industrial buildings to the south and The Hospice of St Francis to the south east. The main town of Berkhamsted lies to the east, with the A41 road to the south. There are various buildings and development also currently</p>

	<p>occupying the site, and so considering this existing built development it is not necessary to keep this land permanently open.</p> <p>25. There are no physical landscape features that define the Green Belt designation, or present any constraints to any proposed development on the site. The south-eastern part of the site has the highest capacity to accommodate new build development on account of the location of existing buildings and the visual enclosure provided by the mature tree/shrub growth at this part of the site</p> <p>26. The development of this site would not present significant harm to the landscape, and would respect the AONB. Prioritising development on this site would minimise impacts on the undeveloped Green Belt that covers almost half of the borough, by ensuring this land was protected and retained as Green Belt.</p>
Include files	
Number	Question 9
ID	LP1021460
Full Name	Audley Court Ltd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>22. Over 50% of the Borough is designated as Green Belt. The Framework, at paragraph 79, states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and the Framework states at paragraph 80 that the Green Belt serves five purposes:</p> <ul style="list-style-type: none"> • <i>“to check the unrestricted sprawl of large built-up areas;</i> • <i>to prevent neighbouring towns merging into one another;</i> • <i>to assist in safeguarding the countryside from encroachment;</i> • <i>to preserve the setting and special character of historic towns; and</i> • <i>to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”</i> <p>23. The site at Bank Mill Lane is designated as Green Belt. However we have considered the potential release of the site from the Green Belt against the purposes listed above</p> <p>24. The site is self-contained by roads and built development to the north, east and south and these strong boundaries will continue to contain development within the site and thus prevent sprawl into the open countryside. These roads will instead form natural boundaries to the Care Community</p>

	<p>25. We do not consider the removal of this parcel of land from the Green Belt will impact on the function of the Green Belt in preventing towns merging into one another, and the site is a logical piece of the Green Belt to release for development, in order for the settlement boundary to be sensibly extended. The development of this site would not be considered encroachment into the countryside, and the site is already surrounded by existing infrastructure and built development</p> <p>26. We do acknowledge that the site is also located within Berkhamsted Conservation Area. Audley has significant experience working with, and enhancing heritage assets and the development would be sympathetic to the character and appearance of the Conservation Area and positively respond to the Conservation Area Management Proposals set out in the Berkhamsted Conservation Area Character Appraisal & Management Proposals (2015). The presence of permanent and clearly defined boundaries around the site would curtail any further development and ensure that the special character of the historic town is preserved.</p> <p>27. It is therefore considered that the release of the site at Bank Mill Lane from the Green Belt will not undermine the purpose of the Green Belt, and this site presents a logical urban extension that will facilitate the sensible extension of the existing settlement boundary of Berkhamsted.</p>
Include files	
Number	Question 9
ID	LPIO21490
Full Name	Hightown Housing Association
Company / Organisation	Hightown Housing Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Question 9 Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above? Yes</p> <p>We agree that the approach to Green Belt policy should comply with the national guidance. The Green Belt review that has been carried out helpfully identified those sites that do not meet all of the normal criteria for being in the Green Belt and, therefore, could reasonably be removed from the Green Belt and allocated for development.</p> <p>Grange Farm in Bovingdon was one such site where the Green Belt review identified it as a less constrained site where release from the Green Belt would enable a new well defined and long term defensible boundary to the Green Belt to be formed. The Grange Farm site is also deliverable within a short time frame. The Council's approach to the Green Belt appears consistent with the</p>

	release of sustainable sites such as this to enable the delivery of development. We support this approach.
Include files	
Number	Question 9
ID	LPIO21514
Full Name	Mr Chris Briggs
Company / Organisation	St Albans City & District Council
Position	Spatial Planning Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q.9 Green Belt – No</p> <p>Also, the relationship to the joint independent Green Belt Review (GBR) process is not clear (albeit it is mentioned). The role of Green Belt restraint in relation to options for greater urban regeneration and development beyond the Green Belt does not appear to have been considered.</p>
Include files	
Number	Question 9
ID	LPIO21536
Full Name	Mrs Valerie Silverton
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 have read the proposals and strongly agree BRAG's responses.</p> <p>BRAG response to Question 9 (please note full document is attached to Q46)</p> <p>Question 9 <i>Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>No</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries. • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour

	<p>of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.</p> <ul style="list-style-type: none"> • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO21580
Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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><u>Green belt development</u></p> <p>To start with, in principle, I fundamentally oppose housing development on any green belt land. The green</p>

belt stops urban sprawl and protects the setting of many of our historic settlements. It protects natural environments; improves air quality and most importantly it protects the unique character of rural communities that might otherwise be absorbed by expanding suburbs.

The National Planning Policy Framework also states that Green Belt boundaries should only be changed in a Local Plan under “exceptional circumstances” and only permit most forms of development in “very special circumstances”.

I do not believe the exceptional circumstances have been made clear and I have not seen evidence that sufficient effort and rigor has been applied in investigating options for development on brownfield sites; nor has there been sufficient engagement with our neighbouring borough councils to exhaust all other options first.

Summary Section from GFRA – Executive summary

As such there is a requirement to justify and prove that the release of Green Belt land is proportionally necessary to meet housing supply requirements. To date the evidence base available to Dacorum Borough Council has not been able to prove this one way or the other.

If subsequently it can be proven that Green Belt release is required to meet housing supply targets, the Green Belt Assessments undertaken have at least identified the scale of sensitivity attributed to differing Green Belt locations across the Borough, albeit that the assessment of the individual site against the functions of the Green Belt in Paragraph 80 of the NPPF terms is considered to be less than thorough.

In any instance with regard to the consideration of land surrounding Tring, it is clear that land to the east of the settlement is significantly more sensitive to encroachment and substantially meets the five functions of the Green Belt in NPPF terms in a manner that other Green Belt sites to the south and north of the settlement respectively are not as sensitive to.

In any instance whilst the GFRA do not accept that it has been robustly proven that Green Belt release is required to deliver housing supply within Tring, the highly sensitive land to the east of the settlement which makes up the fields referred to as “*Grove Fields*” is clearly unsuitable for residential development. In planning balance the weight that can be attributed to the delivery of housing supply on this land against the harm that it would deliver environmentally to the site and its surroundings does not sufficiently define sustainable development; parking the suitability of Green Belt issues aside, the land is clearly more environmentally sensitive than Green Belt land to the south of the settlement.

GFRA full document attached to question 46

Include files	
Number	Question 9
ID	LPIO21593
Full Name	Mr Charlie and Claire Laing

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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><u>Green belt development</u></p> <p>To start with, in principle, I fundamentally oppose housing development on any green belt land. The green belt stops urban sprawl and protects the setting of many of our historic settlements. It protects natural environments; improves air quality and most importantly it protects the unique character of rural communities that might otherwise be absorbed by expanding suburbs.</p> <p>The National Planning Policy Framework also states that Green Belt boundaries should only be changed in a Local Plan under "exceptional circumstances" and only permit most forms of development in "very special circumstances".</p> <p>I do not believe the exceptional circumstances have been made clear and I have not seen evidence that sufficient effort and rigor has been applied in investigating options for development on brownfield sites; nor has there been sufficient engagement with our neighbouring borough councils to exhaust all other options first.</p> <p>GFRA Response to Question 9 , full document attached to question 46</p> <p>We note that Dacorum Borough Council are taking on the approach of only adjusting Green Belt boundaries in "<i>exceptional circumstances</i>" and the approach taken thus far is to commission the 2 Stage Green Belt Review that had been in reviewed in full.</p> <p>The Housing White Paper 10 clearly identifies a requirement for authorities to first demonstrate that brownfield sites have been 1) most efficiently used and 2) exhausted in their use (including existing and long standing underuse) before any consideration of removing land from the Green Belt is even considered.</p> <p>It is our opinion that the Local Authority to date have not fully exhausted or comprehensively reviewed their brownfield landbank in a manner that successfully meets the criteria of review as defined by the Housing White Paper and this has to be undertaken before any</p>

consideration of removing or amending Green Belt boundaries is undertaken.

To date as previously advised in this report it is not considered that a full exploration of brownfield options, particularly consideration of density, scale and massing in relation to brownfield sites within existing settlements, has been undertaken in such a manner that it is not possible or justified at this stage to define exceptional circumstances under the Green Belt test.

If the Local Authority are able at a future date to demonstrate robustly that there is a requirement to unlock Green Belt designated land, then the initial works undertaken in the Green Belt Review are in principle welcomed. However it should be noted that the methodology undertaken for assessing site criteria is in our opinion partly flawed. The methodology makes use of the functions of the Green Belt as set by Paragraph 80 11 , which is considered in principle to be a reasonable starting point.

However in assessing sites against the appropriate bullet point the same weight is prescribed to the consideration of bullet point 3 (Safeguarding the countryside from encroachment) that is prescribed to bullet points 1 and 2 (Unrestricted spoil of large built up areas and Prevention of neighbouring towns from merging respectively).

The works undertaken in the Green Belt review are ultimately to identify what land does not fully meet the expectations of Green Belt land within the Borough so as to assess its suitability for potential unlocking. By the very nature of the exercise, the land parcels assessed, if allocated will encroach into the countryside. Therefore the consideration of the sites against bullet point 3 is not considered to offer the same potential weight of harm as in relation to bullet points 1 and 2.

Nevertheless the general approach within Stages 1 and 2 are in principle reasonable.

It is however our view that the sites reviewed to the east of Tring, including sites TR- H1, TR-H2 and TR-H3 which form the basis of interest of the GFRA, are considerably more sensitive to impact upon openness in Green Belt terms than those sites to the north and south of the town.

We expect that should it be proven that the test of exceptional circumstances can be met at some point within the plan period, any allocation of Green Belt land is thoroughly justified given that there is a clear two tier level of harm that can be applied to the more sensitive sites to the west of Tring and the less sensitive sites to the north and south.

It is accepted that recent planning decisions have made clear that settlement boundaries provide a starting point for debate and cannot be applied as a definitive boundary when determining planning applications; however it is essential that the correct weight of harm is applied to Green Belt land to fully identify any harm that can be applied to development within it. The NPPF provides a clear weight of significant prescribed harm to inappropriate development in the Green Belt and further to this it is important that in planning balance

	<p>Dacorum apply sufficient weight to accompanying environmental harm that can be applied to any particular Green Belt site.</p> <p>With regard to sites TR-H1, TR-H2 and TR-H3 it should be noted that beyond the clear Green Belt harm that could be applied these sites are located in an unsustainable location, provide a high grade of agricultural quality soil within a wildlife corridor that passes between reservoirs and the AONB. Further to this land at TR-H1 is subject to hydrological pressures that would need full examination with regard to any further risk.</p> <p>As such it is requested that the Local Planning Authority makes sure that the proposed approach taken to Green Belt sites in particular offer a fully justified planning balance where it can even be proven that exceptional circumstances provide due consideration of that land in the first instance.</p> <p><i>10 Housing White Paper, February 2017</i> <i>11 Paragraph 80, National Planning Policy Framework (2012)</i></p>
Include files	
Number	Question 9
ID	LPIO21633
Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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><u>Green belt development</u></p> <p>To start with, in principle, I fundamentally oppose housing development on any green belt land. The green belt stops urban sprawl and protects the setting of many of our historic settlements. It protects natural environments; improves air quality and most importantly it protects the unique character of rural communities that might otherwise be absorbed by expanding suburbs.</p>

The National Planning Policy Framework also states that Green Belt boundaries should only be changed in a Local Plan under “exceptional circumstances” and only permit most forms of development in “very special circumstances”.

I do not believe the exceptional circumstances have been made clear and I have not seen evidence that sufficient effort and rigor has been applied in investigating options for development on brownfield sites; nor has there been sufficient engagement with our neighbouring borough councils to exhaust all other options first.

GFRA Response to Question 9, full document attached to question 46

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State..." (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacrom, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)

In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

	<p>If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...<i>relevant consideration...</i>", which under the law of England and Wales is a necessary element of a public body's decision making process¹⁷.</p> <ul style="list-style-type: none"> • See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD 105.
Include files	
Number	Question 9
ID	LPIO21644
Full Name	Silversaw Ltd
Company / Organisation	Silversaw Ltd
Position	
Agent Name	Mark Novelle
Company / Organisation	CBRE
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Silversaw is supportive of DBC's approach to assessing their Green Belt as part of the development of the new Local Plan and as part of their wider strategy to deliver the housing and development that DBC requires.</p> <p>The approach to reviewing the Green Belt, in accordance with their Local Plan timetable reflects NPPF para83. This states that established Green Belt should only be altered in exceptional circumstances through the preparation or review of the Local Plan. We also agree with the approach taken by DBC to secure a long-term view of the Green Belt to avoid continually reviewing the boundaries to accommodate changes to growth levels during the plan period.</p> <p>Given the emphasis on Sustainable Development, which is the golden thread running through the NPPF, we are in agreement with DBC's approach to assessing sites on both Green Belt purposes and through their levels of sustainability.</p> <p>We are in agreement with the outcomes of the Stage 2 Green Belt Review and Landscape Appraisal which identified a range of Green Belt sites performing weakly against the Green Belt purposes and as such provide an opportunity for Green Belt release.</p>
Include files	
Number	Question 9
ID	LPIO21661
Full Name	Hannah Pattinson

Company / Organisation	Linden Homes
Position	Strategic Land Regional Director
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green Belt Review</p> <p><i>Part I</i></p> <p>The Green Belt Review Part I introduces an additional Green Belt purpose titled “maintaining existing settlement pattern”. This was recently criticised at the Welwyn Hatfield Local Plan Examination in Public. The Green Belt Review also covers the St Albans area which has had a Plan found unsound using the Green Belt Review as part of its evidence base. The Green Belt Review should concentrate on the five purposes as identified in national policy. Any use of the additional purpose in the selection of sites is considered to be unjustified and unsound.</p> <p>The site at Pea Lane, Berkhamsted is located in “Parcel 06”, which the Green Belt Review identifies as making a “significant” contribution to the historic setting of Berkhamsted, however, this parcel does not make any contribution to the historic part of Berkhamsted at all. It adjoins Northchurch which is a much more modern development. This is an error in the Green Belt methodology. Just because a parcel adjoins what is deemed to be a “historic” settlement, does not ultimately mean it makes a contribution to its setting. A more detailed and refined assessment is required to justify this conclusion. The way the parcel interacts with the historic setting is an integral part of any assessment. There needs to be a connection between the land and the historic element of the settlement otherwise it bears not significance to the criterion. Simply adjoining a modern part of a historic town is considered too crude and not justified. That prevents any development adjoining a historic town ever being possible for potential development, which is not the intention of the policy.</p> <p>Additionally, if this site is looked at in isolation it adjoins only 80 and 90s culs de sacs, which again makes no contribution to the historic part of Berkhamsted. There are clearly two issues here; one is a problem in relation to the scoring of the parcels and the other is that there is no site-level assessment and so no fine-grain judgement is made at a site level. The site is categorised by the larger-scale, strategic parcel assessment and in this case it is judged on the one significant contribution and as such not identified as being a potential location to release. This finer grain assessment is necessary, specifically around the settlements as there will be areas that do not meet the 5 tests of Green Belt purposes (as is the case here), however, because they sit within larger parcels they are not necessarily identified. This</p>

represents a missed opportunity and one that is considered to be a key flaw in the Green Belt Review.

There is also a consistency error in relation to the Green Belt Review as part of Parcel 11 (to the south of Berkhamsted) is identified for potential release even though it makes a significant contribution to two of the purposes of Green Belt. Parcel 06 in the report is identified as only contributing to one of the purposes (and this is disputed as set out above) and yet it is maintained in its entirety? There does not appear to be sufficient explanation to warrant these conclusions and on the face of it appears to be an error and a decision which is not justified.

Part II

A Part II Green Belt Review has been undertaken to try to remedy the issues in the Part I document and as such does undertake a more refined parcel-level assessment. This confirms the point that the smaller scale parcel within which the site at Pea Lane is located (BK-A13) makes no significant contribution to Green Belt purposes.

Whilst this Part II assessment is useful in the context of assessing smaller parcels it goes on to combine landscape and other planning constraints, which is not the purpose of the Green Belt Review. This confuses the issue, to the point where it is making judgements about sites, when realistically the Green Belt Review should be a tool for decision making purely based on Green Belt issues, rather than making decisions itself and taking into account other planning issues. Making judgements about the SAMs, Flood Risk, AONB... etc is not appropriate here. These constraints should not contribute to a Green Belt Review and certainly shouldn't influence how sites are assessed as they are not Green Belt issues.

It should also be noted that the scoring for parcel BK-A13 is not correct in this Part II document. It identifies a score of "3" for the Towns Merging criteria, however, this site will not cause any merging issues as there are no settlements nearby. Also for sites BK- A11, BK-A12 and BK-A13 the Part II Review scores the issue of Sprawl a "3", however it is clear that the A414 provides a much more sensible, defensible boundary in this location. If these two criteria are correctly scored with a "1" or a "2" then this whole area south west of Berkhamsted is classified as having a limited contribution to Green Belt purposes in the scoring system and so would warrant further consideration for potential release.

Include files	
Number	Question 9
ID	LPIO21683
Full Name	Countryside Properties (UK) Ltd
Company / Organisation	C/O Bidwells

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"> • CPUK are aware of the significant constraint applied by the Green Belt surrounding the largest settlements within the Borough; the evidence base supporting The Plan, particularly the SHLAA provides the urban capacity assumptions given for each settlement. While this confirms that substantial levels of development can be provided within existing urban areas; it is not clear whether all sites identified will be deliverable; but even so, it is entirely clear that the needs for the borough cannot be met within the urban areas alone. As such, this constitutes the exceptional circumstances to warrant the release of sites from the Green Belt to meet future needs. There is justification for release of Green Belt land to allow for allocation of sites for housing to 2036. • making best use of brownfield sites and supporting their regeneration; • making best use of land which is currently underused, including land owned by the public sector; • maximising the density at which new development is built; and • exploring whether any other Councils can help meet some of our local needs • CPUK supports the Housing White Paper checklist for considerations before making changes to Green Belt boundaries: • As noted earlier in these representations; there is not a view at present to look to meet Dacorum's needs outside of the district; therefore, it is appropriate for Green Belt sites to be considered. As the Green Belt is tightly drawn around the three main settlements, the most sustainable pattern of development will necessarily require Green Belt release, including at Tring. • CPUK suggest extensive work is undertaken to establish infrastructure requirements that could prevent the delivery of sites; particularly for large scale Green Belt sites. This is likely to be the case on sites north/west of Tring, due to the limited infrastructure in these locations; whereas land south of Aylesbury Road, Tring could be brought forward without significant infrastructure enabling works. • This representation is accompanied by a Call for Sites submission at Appendix 2 which includes a detailed review of the Land south of Aylesbury

	<p>and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations</p> <ul style="list-style-type: none"> • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town”
Include files	
Number	Question 9
ID	LPIO21734
Full Name	Mr John Mawer
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In the foreword, Graham Sutton speaks of the core strategy enabling the council to ‘stop inappropriate development’. I applaud this sentiment, and have written in our local magazine in support of the principle of the current core strategy. If we are to accept and support development to meet the needs of the community, we need to be reassured that there will be rigorous protection of existing green belt. Thus far this has not been the case, with seemingly the council unwilling or unable to enforce even the conditions set in granting plans. (Upper Bourne End Lane contains prime examples of inappropriate development and unenforced conditions.)
Include files	
Number	Question 9
ID	LPIO21750
Full Name	David Lang
Company / Organisation	Hemel Hempstead Constituency Labour Party
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt - It is noted that a number of present Green Belt areas may be re-designated. It is presumed these are the areas shown on your map and your assessment that the necessary exceptional circumstances pertain is complete, and that these areas have been assessed as 'lower grade' Green Belt.
Include files	
Number	Question 9
ID	LPIO21752
Full Name	Elizabeth Hamilton
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 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</p>

	<p>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 5.2.2 is misleading since housing need is not an exceptional circumstance.</p>
Include files	
Number	Question 9
ID	LPIO21823
Full Name	W Lamb Ltd
Company / Organisation	W Lamb Ltd
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"> • The proposed approach to the Green Belt is broadly supported, in particular the Council's decision to undertake a review of the current Green Belt boundaries. We do not wish to make any comment on the existing Major Developed Sites • With regards to the proposed approach to the Green Belt however, Boyer has undertaken an independent review of the Council's Stage 1 and 2 Green Belt Reviews on behalf of W Lamb Ltd, with particular reference to their land interests at Shendish, which comprises the majority of Green Belt parcel D-S3. This response should therefore be read alongside Boyer's independent review, enclosed at Appendix 3. • The Stage 2 Green Belt Review recommended that part of the Shendish site be subject to further assessment for potential Green Belt release (discussed further at Appendix 3). • Boyer's independent review (June 2017) concludes that the general approach that the Council has undertaken regarding its Green Belt assessment is logical, clear and transparent. When considered

against the purposes of the Green Belt as defined within the NPPF and best practice guidance however, two limitations are identified in respect of the Stage 2 Review. These relate to, firstly, the Council's interpretation of the NPPF Green Belt purposes (in particular Purpose 12) and, secondly, the application of the Landscape Appraisal as part of the Green Belt Review.

- With regards to the former, the Council has provided its own 'interpretation' of the NPPF purposes and by doing so has altered the wording and subsequently the meaning and emphasis of those. In some instances, the Council's interpretation is more stringent than the purposes set out in the NPPF, resulting in a more stringent test being applied to assess whether land meets the purposes of the Green Belt than set out in national policy. This has skewed the resulting assessment, particularly in respect of the extent to which existing sites (including land at Shendish) make a contribution towards checking the unrestricted sprawl of large built-up areas.
- In terms of the second limitation, the Stage 2 Green Belt Assessment appears to have taken into account constraints which bear no relevance to the fundamental purpose of the assessment – i.e. to provide evidence of how different areas perform against the Green Belt purposes set out in national policy. For instance, the Stage 2 Assessment includes a Landscape Appraisal in order to assess which sites are least sensitive in landscape terms, and then uses this to make recommendations where land might be released without detriment to the overall integrity of the Green Belt. However, this Landscape Appraisal is based on the landscape quality of the respective land parcels, as opposed to the contribution (if any) that the respective landscape makes to the prevention of neighbouring towns from merging into one another, as advised by PAS.3 The quality of the landscape itself is not a relevant consideration for a Green Belt purposes assessment and so this element of the Stage 2 Assessment can therefore carry no weight in informing the Green Belt Review.
- Notwithstanding the first limitation highlighted above, if the Council's landscape assessment is not applied to the Green Belt Assessment, then Dacorum's own conclusions were that Parcel D-S3 (as per **Appendix 1**) was assessed as a 'weakly contributing sub-area'.
- As part of the subsequent Boyer review, an independent assessment of Land at Shendish was also undertaken against the purposes of the Green Belt, to address the limitations identified above. This concludes that the entire site defined as D-S3 should be removed from the Green Belt. As set out in Question 3 above, it is critical to ensure the soundness of the plan in going forward that this methodology is robust.
- As acknowledged in our independent Green Belt Assessment, whether the entire site is

	subsequently allocated should then be subject of a separate policy assessment, of which a Landscape Appraisal would form part
Include files	
Number	Question 9
ID	LPIO21846
Full Name	Bevangrace Limited
Company / Organisation	Bevangrace Limited
Position	
Agent Name	Paul Cronk
Company / Organisation	JB Planning Associates
Position	Principal Consultant
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>With regard to the principle of development for residential purposes, we consider that the site presents a logical opportunity to adjust the current Green Belt boundary, to correct what we regard as an anomaly. The land in question is located within a generally built-up urban context, with existing development surrounding much of the site. The railway line, situated to the south and west, and London Road, to the north and east, almost entirely contain the site.</p> <p>Consequently we consider that the site is well related to the existing urban area, and is not related to the surrounding areas of Green Belt.</p> <p>The functions of the Green Belt and its 5 stated purposes are set out in paragraph 80 of the National Planning Policy Framework (NPPF). Having regard to the well defined and enclosed nature of the land, we do not consider that development would result in unrestricted sprawl of a large built-up area, and neither will it encroach into the countryside. Similarly, development of this site would not cause Hemel Hempstead to merge with any other settlement, due to its enclosed nature and its relationship to the existing urban area.</p> <p>Meanwhile, in the context of insufficient brownfield land being available within existing urban areas to meet housing needs, the release of this site for development would not prevent any suitable urban land also coming forward for development. In relation to the remaining purpose of Green Belt land, this site clearly does not function to preserve the setting and special character of a historic town.</p> <p>We note that the site forms part of Green Belt parcel GB14B, which was assessed as part of the November 2013 Stage 1 Green Belt Review produced for the Borough Council by Sinclair Knight Merz. This parcel of Green Belt land generally covers the area between Hemel Hempstead and Kings Langley, to the south of the railway line, with the site at Ridgeway close forming its far northern boundary where it meets Hemel Hempstead. Its main function is identified as contributing towards maintaining the setting of Kings Langley and maintaining the existing settlement pattern by</p>

maintaining a gap between Hemel Hempstead and Kings Langley.

The 2013 assessment notes that urban characteristics are strongest to the southwest of Hemel Hempstead (where the site is located), and that this northern part of the assessment parcel has a sense of containment, with limited opportunities for long distance views. It further notes that within this part of the parcel the proximity and frequency of built form gives an urban edge character. This northern part of parcel GB14B is therefore identified for further assessment as a strategic sub-area (D-S3). The Stage 1 assessment concludes that:

“Assessed in isolation the strategic sub-area makes a limited or no contribution towards checking sprawl, preventing merging or safeguarding the countryside. A reduction in the size of the strategic parcel would not significantly compromise the primary functions of the Green Belt or compromise the separation of existing settlements.”

The ARUP Stage 2 Green Belt Review and Appraisal Report (January 2016) has reconfirmed that the lower (eastern) part of the site is less sensitive in Green Belt and landscape terms and recommended that a Green Belt boundary amendment be considered given that the removal of the sub-area would not compromise the ability of the wider Green Belt to meet its purposes.

It is therefore clear that in addition to the site itself being, in our view, an anomaly making no contribution towards the functions of the Green Belt, the wider area of Green Belt of which it is part. In this context, we consider the development of this self-contained parcel within an urban fringe context to be entirely appropriate, having regard to the purposes of the Green Belt.

Issues and Options

The Borough Council is also undertaking a Local Plan Issues and Options public consultation at the same time as its 'Call for Sites'. This identifies potential development options for meeting its overall housing requirement. One of these (HH-h3 – Land at Shendish, London Road) would result in land around Shendish Manor Golf Club being removed from the Green Belt and developed for approximately 900 dwellings.

Even if that option is not ultimately pursued, the Borough Council has new evidence which suggests that the eastern parcel of that potential housing allocation site (which sits next to our land at Ridgeway Close site) makes a weak contribution to meeting national Green Belt tests, and should be considered for possible boundary amendment. This would result in parcel D-S3 being removed from the Green Belt. If this change were to occur, our client's site would become a small narrow isolated area of Green Belt located between the A4251 road and railway line. In such a situation, we consider that the arguments for its removal from the Green Belt would be overwhelming, and that no reasonable justification for its continued designation in terms of satisfying the national Green Belt tests would stand up to detailed scrutiny. The area of railway track in-between our client's site and parcel D-S3 should also be removed.

	<p>We consider that removal of the site at Ridgeway Close from the Green Belt will not undermine its functions, given the enclosed nature of the site. If our site were to be removed from the Green Belt, only a small area of Green Belt would remain in respect of land north of Nash Mills Lane. This would contain The Red Lion Public House and its car parking area on its western side, and Nash Mills Wharf on its eastern edge. We think that this isolated area of land might also fail to fulfil the national Green Belt purposes. Accordingly, we recommend that it too is removed, together with the strip of Green Belt covering London Road itself, which is located in-between it and our client's site. However, we must point out that we have no site interests in relation to the other parcel of land.</p> <p>We have prepared a Proposed Green Belt Amendments Plan (see drawing: 1290/03) which shows a more logical and defensible Green Belt boundary revision, which would be much more capable of enduring over the longer-term. This would remove our client's site, as well as the other land referred to above.</p>
Include files	
Number	Question 9
ID	LPIO21856
Full Name	Pennard Holdings
Company / Organisation	PENNARD HOLDINGS
Position	
Agent Name	Peter Atkin
Company / Organisation	Pegasus Group
Position	Principal Planner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The following section seeks to demonstrate that the site is suitable to contribute towards the development needs identified in Section 4 above in respect to Green Belt which represents the key planning policy constraint against the development of land at Flamstead</p> <ul style="list-style-type: none"> The Green Belt designation carries significant weight as a material consideration in planning policy and development management. The NPPF is explicit that changes to Green Belt designations should only be altered in exceptional circumstances through the Local Plan process (paragraph 83), in the context of promoting sustainable development as set out in the NPPF (having regard to social, economic and environmental factors). It is our view that 'exceptional circumstances' exist to amend the Green Belt boundary in DBC to warrant the release of the sites from the Green Belt. The main purpose of this section is to set out an assessment to the value of the sites in Green Belt terms in order that the 'harm' of its loss can be appropriately considered.

- Pegasus Group has undertaken an independent review of DBC's Green Belt Review Stage 1 (2013) and Stage 2 (2016) and provides a professional opinion regarding the contribution Flamstead itself makes and the contribution the sites at Singlets Lane and Delmer End Lane make towards the purposes of the Green Belt as set out within the NPPF (as presented in Section 3 above).
- The full analysis is provided at Appendix 5 and summarised in Tables 8 and 9 below:

Table 8: Summary of Flamstead's contribution to Green Belt purposes

Flamstead's Contribution to Green Belt Purposes

The village does not make an important contribution to the openness of the Green Belt due to the presence of development surrounding the Conservation Area, which limits its openness. Accordingly, the permanence of the Green Belt has effectively been eroded over time and it is considered appropriate for Flamstead to be 'inset' from the Green Belt in accordance with the provisions of the NPPF.

Table 9: Summary of the sites contribution to Green Belt purposes

Green Belt Purpose

Assessed Site Contribution

To check the unrestricted sprawl of large built-up areas

Limited or no contribution

To prevent neighbouring towns from merging

Limited or no contribution

To assist in safeguarding the countryside from encroachment

Partial contribution

To preserve the setting and special character of historic towns

Limited or no contribution

To assist in urban regeneration by encouraging the recycling of derelict and other urban land

Limited or no contribution

Moreover, the analysis enclosed at Appendix 5 provides a clear 'Green Belt & Landscape Strategy' for both sites to ensure appropriate mitigation is inherently designed into any future development to protect and preserve the sites interface with the settlement and wider (Green Belt) countryside

Conclusions – Implications for the New Local Plan

- In preparing the new Local Plan, DBC should consider revising Green Belt boundaries in the context of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the exceptional circumstances test;
- Flamstead does not make an important contribution towards the openness of the Green Belt and accordingly it is appropriate for Flamstead to be

'inset' from the Green Belt within the new Local Plan; and

- The sites at Singlets Lane and Delmer End Lane on the eastern edge of Flamstead make only a limited contribution to Green Belt purposes and accordingly the release of the sites would not give rise to significant 'harm' in Green Belt policy terms
- The purpose of this section is to provide DBC with comfort that the removal of the Flamstead sites (land at Singlets Lane and land at Delmer End Lane) from the Green Belt and the subsequent allocation for residential development in the new Local Plan is the appropriate and proper mechanism for doing

Green Belt Review

- The NPPF attaches great importance to the Green Belt, highlighting its fundamental aim of preventing urban sprawl by keeping land permanently open (paragraph 79). However, despite their supposed permanence, the Green Belt may be reviewed by Local Authorities through their Local Plan reviews (paragraph 83), which should take account of the 'need to promote sustainable patterns of development' (paragraph 84). That includes the negative consequences of channelling development towards urban areas or to areas beyond the Green Belt rather than existing boundaries. Any changes to the Green Belt should therefore take effect through the Local Plan reviews and then only in 'exceptional circumstances'.
- Guidance contained within the NPPF and NPPG in addition to various ministerial statements and correspondence with the Planning Inspectorate, in combination with the growing emphasis on Localism is clear that it is up to Local Authorities to determine planning matters themselves, including the future of their Green Belt. Therefore, if significant benefits associated with meeting local housing needs exist in combination with other local benefits, then the opportunity exists to justify the release of land from the Green Belt for development to ensure that the Green Belt does not become an obstacle to delivering 'sustainable patterns of development' (NPPF paragraph 84) which might otherwise restrict the ability of Local Authorities to best meet the future development needs of their communities

Housing Allocations

- It is our view that the new Local Plan should set out the strategic levels of development (based on identified needs) to be delivered across the Local Plan- period, identify the broad locations where growth/development will take place and identify and allocate specific sites to ensure the objectives of the new Local Plan are deliverable
- Accordingly, it is logical when reviewing Green Belt boundaries to 'backfill' any released Green Belt land with an appropriate site allocation to provide the necessary certainty that the Local Authority

can deliver the development required to meet its needs and spatial objectives. Moreover, the exceptional circumstances required to release the Green Belt in the first instance will likely not exist unless the benefits associated with any development clearly outweigh the potential harm. The inference being that the Green Belt will not usually be released unless for development purposes. It is therefore considered that the removal of land from the Green Belt and the subsequent allocation for an alternative land use are intrinsically linked

- Such an approach is supported by the NPPF whereby paragraph 157 states that Local Plans should:
 - Plan positively for the development and infrastructure required in the area to meet spatial objectives;
 - Indicate broad locations for strategic development on a key diagram and land- use designations on a proposals map; and
 - Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate
- In conclusion, it is therefore considered that the implementation of a spatial strategy that identifies Green Belt land for release and which allocates such land for development through a Housing Allocation within the new Local Plan will enable DBC to plan positively to ensure that the borough can deliver the strategic levels of development it needs in line with the requirements of the NPPF
- The consequences of deferring any allocation of the sites in Flamstead to the latter stages of the Local Plan would be:

i) To create a policy void in the interim period creating uncertainty for investment and the delivery of key spatial objectives for the borough;

ii) To unnecessarily delay development of two sustainable, deliverable and available sites which can contribute towards the borough's housing needs, which as highlighted above is important in the context that the Council is unable to demonstrate a 5-Year housing land supply as required by the NPPF.

Conclusions – Implications for the New Local Plan

- Guidance at all levels is clear that it is up to Local Authorities to determine where development should and shouldn't go;
- The preparation of a new Local Plan provides the appropriate mechanism to review the Green Belt boundary and release sites for redevelopment where this promotes sustainable patterns of development and exceptional circumstances apply;
- The new Local Plan should plan positively and support the release of the site from the Green Belt and replace with a 'Housing Allocation' in the Plan to demonstrate that the spatial objectives of DBC can and will be delivered

Include files	
Number	Question 9
ID	LPIO21876
Full Name	Louis Quail
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 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"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.berkhamsteadactiongroup.com/wp-content/uploads/2016/08/BRAG-Analysis-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf). • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations. • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review

	<p>should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.</p> <ul style="list-style-type: none"> The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town ”
Include files	
Number	Question 9
ID	LPIO21944
Full Name	Thomas and Margaret Ritchie
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 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>This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas.</p> <p>Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided.</p> <p>Both stages of the Green Belt Review are flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to the Stage 1 Green Belt Review http://www.berkhamstedtowncouncil.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf</p> <p>Previous conclusions on the important role of the Green Belt by a series of Planning Inspectors have been ignored in favour of the Green Belt Reviews produced by consultants whose starting point appears to be an assumption that current Green Belt policy is wrong.</p> <p>We strongly agree with 5.2.6 about the need to consider the sustainability of proposed sites - infrastructure, accessibility, health and well-being issues are all crucial. Consideration of the impact on the character of each town or village is also fundamental.</p> <p>We note the Inspector’s Report to Dacorum Borough Council [PINS/A1910/429/4, July 2013] which states, with reference to Market Towns, “...However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the</p>

	Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town". [para 39]
Include files	
Number	Question 9
ID	LPIO21988
Full Name	Waterside Way
Company / Organisation	Waterside Way Sustainable Planning Ltd
Position	
Agent Name	Mr Stephen Harris
Company / Organisation	Emery Planning Partnership
Position	Senior Consultant
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • It is clear that Green Belt land will be required notwithstanding which option is progressed. Therefore in answer to Question 9, we agree that Green Belt land should be released. However we have previously set out our concerns on the methodology and how that has been applied to our client's site. This is set out later when we assess the site. The key point is that each of the sites listed in Section 10.8 should be assessed against the five purposes in paragraph 80 of the NPPF. To date they have not and decisions should only be taken on sites once that exercise has been undertaken. If they have not the plan is proceeding on an unsound evidence base. • With regard to Issue 9, then we note that there is assumed to be capacity for 10,940 dwellings from various sources of supply. This will have an impact on the residual housing need to be met on greenfield and Green Belt land. We have not undertaken an assessment of that supply at this early stage. However the key point is that this should be seen as a maximum figure and that the total capacity of 10,940 is unlikely to be met in the plan period. Therefore when releasing land from the Green Belt it will be necessary to ensure sufficient land is released and/or safeguarded in the eventuality that the urban capacity is not realised.
Include files	
Number	Question 9
ID	LPIO21995
Full Name	Mr Paul Phipps
Company / Organisation	Whiteacre Ltd
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The council's Green Belt review has identified sites which do not meet all of the statutory criteria for being within the Green Belt and, therefore, could reasonably be removed from the Green Belt and allocated for development.</p> <p>Grange Farm in Bovingdon was one such site. Here the review identified it as a less constrained site where release from the Green Belt would enable a new well defined and long term defensible boundary to the Green Belt to be formed. The Council's approach to the Green Belt appears consistent with the release of similar sustainable sites, to enable the delivery of the plan's objectives.</p>
Include files	
Number	Question 9
ID	LPIO22024
Full Name	Gallagher Estates
Company / Organisation	Gallagher Estates
Position	
Agent Name	Mrs Hanna Staton
Company / Organisation	Pegasus Group
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • Whilst the Inspector of the Core Strategy fully supported the settlement hierarchy previously proposed, it should be recognised that given the scale of development required, it may be necessary to adopt a more dispersed distribution strategy, which still focuses on the main towns, however, allows the smaller settlements to contribute towards meeting housing needs. This may also improve the sustainability of these locations, as discussed below. Whilst this strategy is the most sustainable at this point in time, other locations can become more sustainable through the provision of additional infrastructure and services to support existing and new communities. • It is agreed that it will be necessary to find sites outside the existing urban area to address the identified housing need in the Borough, which will require the removal of land from the Green Belt where it is appropriate to do so. Gallagher Estates support the Council's positive moves to identify sustainable strategic sites through two stages of the Green Belt Review and the draft Schedule of Site As demonstrated in Appendix C, Land at New Mill, Tring is a site that can contribute 400 homes and necessary infrastructure either on its own or as part of a wider extension with adjoining land along the north east edge of Tring.

- It is unclear from the evidence presented whether the Green Belt Review identifies sufficient sites that perform less well against the purposes of the Green Belt and that could be removed from the Green Belt to meet the different dwelling requirement options proposed. If insufficient land has been identified to achieve the highest figure (1,085 dwellings per annum), then it is advised that the review is revisited to identify further capacity on top of those sites already identified.
- As discussed in more detail in our answer to Question 18 below, Gallagher Estates disagree with the proposal to stagger the release of large Green Belt sites. Whilst it is understood that the Council's desire to ensure that supporting infrastructure is secured, it is believed that delayed release of sites could threaten the Council's delivery of a challenging number of homes in the plan period.
- It is widely recognised and evidenced (by Lichfields in their Start to Finish report of November 2016) large sites have longer lead in times. For example, the average 1,000 home scheme takes approximately 5 years to go through the planning approval period and a further one year from planning to delivery. This is due to there potentially being multiple land owners/ developers and issues to cover as part of a comprehensive planning applications and Masterplan. The LPA has ultimate control of the delivery of commencement/ occupation of development and where necessary linking it to infrastructure.
- In terms of annual completions from large sites of circa 1,000 dwellings, evidence suggests that circa 100 homes will be delivered per annum. This is likely to require a number of developers and outlets to deliver this level of completions. Therefore, altogether including pre planning, post planning and build out a scheme of 1,000 units is likely to take a reasonable period of time and, even with the healthy housing market that exists in the Borough.
- In light of this, there is no need for a policy restraint to the delivery of larger Green Belt sites, indeed, quite the opposite is required to ensure that they commence as soon as possible and are delivered within the plan period.
- In addition to removing sites from the Green Belt for development, the Council may wish to consider safeguarding some land for development beyond the plan period, as recommended by paragraph 85 of the NPPF and acknowledged in paragraphs 5.4.3, 5.4.4, 5.4.15 and 6.4.5 of the consultation document. This will assist to ensure that the revised Green Belt boundary endures beyond the plan period and that there is a surplus amount of land available over and above the dwelling requirement as a contingency should there be changing circumstances to warrant more development.
- In relation to New Mill (site Tr-h3 in the Schedule of Site Appraisals document), it is considered that

	<p>the site is the most natural urban extension to Tring and its removal from the Green Belt would help address local needs with minimal landscape impact and little impact on the purposes of the Green Belt. Attached is a Vision Document (Appendix C) for the proposed development of the site, which demonstrates the sustainability, availability and deliverability of the site and the multiple benefits of its allocation in the emerging Local Plan.</p>
Include files	Appendix C - Stuart Wells Gallagher Estates -office BIR.4712_IssuesandOptionsReps_FINAL_131217 APPENDIX C.pdf
Number	Question 9
ID	LPIO22066
Full Name	MCJ Trust
Company / Organisation	MCJ Trust
Position	
Agent Name	Samuel Dix
Company / Organisation	Smith Jenkins
Position	Senior Planner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Our client agrees with the proposed approach to Green Belt insofar as the willingness of the Council to consider release is supported. However, we regard the current evidence on the Green Belt across the Borough as being flawed and requiring review.</p> <p>In respect of our client's land at Flaunden, the 2013 Stage 1 assessment amalgamated the site into parcel 'GB13 – land to the south of Bovingdon'. Annex 1 to that assessment confirms that this parcel is over 1,000 hectares in size. The more recent Stage 2 assessment has not considered our client's land and instead focuses on sub-areas identified in the Stage 1 report.</p> <p>We consider that the Stage 1 assessment should be carried out again for two reasons. Firstly, the circumstances of land across the Borough may feasibly have changed in the four years that have elapsed between the different stages of the Green Belt review. This matter is exacerbated by the fact that the two stages have been completed by different consultants who may not have used the same desktop research methods or visited the same sample locations with each parcel. Secondly, the Green Belt assessment has not been conducted with sufficient granularity to provide accurate conclusions on how individual sites fulfil the purposes of the Green Belt. Across a parcel of some 1,000 hectares there will be significant variance in how land performs. Therefore the conclusions drawn may not be considered as a reliable average across all of the land considered.</p> <p>It is accepted that a degree of sifting is necessary between stages of Green Belt assessment. However, we consider that a more accurate approach would be to consider individual parcels around a greater number of</p>

settlements rather than just the largest towns and villages. We have already highlighted the unsound approach the Local Plan's evidence base has taken in respect of settlement hierarchy. In respect of Green Belt assessment, a reconsideration of how parcel GB13's overall assessment compares with a finer-grained assessment of our client's site reveals that it would be appropriate to make further small-scale releases in rural settlements such as Flaunden:

GREEN BELT

PURPOSE

ASSESSMENT OF GB13

CONTRIBUTION

INDIVIDUAL ASSESSMENT OF LAND AT FLAUNDEN CONTRIBUTION

To check the unrestricted sprawl of large built-up areas

The parcel is located away from large built-up areas of London, Luton and Dunstable and Stevenage. It does not form a connection with a wider network of parcels to restrict sprawl

Limited or no

The site is located away from all built-up areas other than those constituting Flaunden itself. It does not form a connection with any surrounding areas and is instead part of the core of the village.

None

To prevent neighbouring towns from merging

The parcel does not fully separate neighbouring 1st tier settlements

Limited or no

The site is within Flaunden itself and only serves to separate parts of the village from other parts of the village. Development would not lead to any coalescence.

None

To assist in

The parcel displays typical rural and Significant

The site is fully enclosed and sits between established Limited

safeguarding the

countryside

characteristics

in

built-form within the village of Flaunden. In contrast with countryside from medium sized arable fields with some the wider parcel GB13, the site comprises a markedly encroachment pasture, bound by dense hedgerows smaller field, which means its contribution to the and frequent hedgerow trees. openness (both visual and physical) of the surrounding Fragmented small pockets of countryside is limited. A much stronger boundary exists deciduous woodland are scattered to the south of the site as shown in Figure 2 of this over the parcel with larger areas of representation. Development would be a logical form of ancient woodland, particularly at in-fill in the existing village, which is a form of Baldwin's Wood in the south. Urban development that is specified as an exception to features include the Brickworks and inappropriate development in paragraph 89 of the NPPF.

other development and unclassified

settlements.

Dispersed

ribbon

6

development and large single dwellings extend along minor routes, particularly from Bovingdon Green to Flaunden and Chipperfield. As a result the parcel exhibits mixed levels of visual openness. Land to the southeast of Bovingdon in particular displays greater levels of enclosure due to landscape features and urban influence due to residential edges.

To preserve the

The parcel contains Flaunden and

Significant

The road-frontage of the site does include part of the

None

setting

and

part of Chipperfield Conservation

Flaunden Conservation Area although it does not make

special character

Areas and is adjacent to Bovingdon

any contribution to the character or setting of this. In fact

of historic towns

Conservation Area. It forms part of

the current boundary treatment of the site with tall

the wider setting for the historic

overgrown hedges is unsympathetic and could be
villages of Latimer and Chenies to the
improved through development. In particular, there are
south of the parcel (in Chiltern
presently no views into or out of the site and therefore
District). The Green Belt acts as an
the setting of Flaunden Conservation Area within the
immediate open and rural historic
wider countryside is harmed by this.
setting, providing views to and from
the countryside.

To maintain
The parcel provides the secondary
Partial
The only gap the site provides is within Flaunden itself.
Limited
existing
local gap between Bovingdon (2nd)
The lack of development in this area is coincidental to
settlement
and Chipperfield (3rd) which is
the existing settlement pattern and is not a defining

pattern
2.1km. The gap is large and has been
feature of the village. In actuality a modest in-fill
subject to ribbon development which
development here represents a logical extension of the
limits the perception of the gap. Any
existing pattern and help consolidate the village with
small scale reduction in the gap could
defensible boundaries. This would be in accordance with
be likely to compromise separation of
paragraph 89 of the NPPF, which allows for limited
the settlements in physical terms, or
infilling in villages in the Green Belt.
levels of visual openness.

Notably in the assessment that has been carried out and replicated above the final purpose of the Green Belt has been incorrectly reproduced. The NPPF does not mention maintaining existing settlement patterns and instead refers to “assisting in urban regeneration, by encouraging the recycling of derelict and other urban land”. Usually all Green Belt parcels are considered to meet this purpose equally as it is a result of the designation itself rather than any particular characteristic of individual sites. Existing settlement patterns *per se* are therefore not material to Green Belt release, although in respect of our client’s land at Flauden a positive relationship and enhancement with the existing

	<p>settlement is still achievable as evidenced in Figure 2. (see attached)</p> <p>The site's perceived contribution to Green Belt purposes may be summarised in the below aerial image, whereby a stronger boundary to the openness of the surrounding countryside is identified to the south of the site whilst the in-fill nature of the site's road frontage is self-evident in the context of the wider the village</p>
Include files	Sam Dix - Land at Flaunden - Q9 - figure 2.pdf
Number	Question 9
ID	LPIO22074
Full Name	Kings Langely & District Residents Association
Company / Organisation	Kings Langley and District Residents association
Position	
Agent Name	Jane Terry
Company / Organisation	Vail Williams
Position	Partner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The National Planning Policy Framework (NPPF) states that 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.' (NPPF paragraph 79)</p> <p>The NPPF defines five purposes of Green Belt as follows:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built-up areas • To prevent neighbouring towns merging into one another • To assist in safeguarding the countryside from encroachment • To preserve the setting and special character of historic towns • To assist in urban regeneration, by encouraging the recycling of derelict and other urban land <p>National policy makes a distinction between 'very special' circumstances that need to be demonstrated to justify inappropriate development in the Green Belt through planning applications, and 'exceptional' circumstances that need to be demonstrated to alter Green Belt boundaries through the plan-making process.</p> <p>In relation to Local Development Plans, national policy states:</p> <p><i>'Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Neither national policy nor guidance set out what should be considered 'exceptional' or 'very special' circumstances.'</i></p> <p>The Green Belt analysis must form part of the evidence base for the Local Plan and therefore the focus of this section of the document is on 'exceptional circumstances' rather than 'very special circumstances'. Neither the NPPF nor the Planning Practice Guidance</p>

(PPG) defines 'exceptional circumstances', and therefore each Local Planning Authority must decide for itself whether these circumstances exist in relation to designated Green Belt within its administrative area. A discussion of the Dacorum approach and options is carried out below with reference to case law.

Additionally, Dacorum Borough Council must consider the exceptional circumstances criteria. PPG asks: '*Do housing and economic needs override constraints on the use of land such as Green Belt?*' and states "*The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan.*' The approach which should be taken by the LPA is to have regard to a wide range of NPPF factors summarised as criteria under the five headings of Local Plan Strategy; Green Belt; Sustainable place-making; Design, landscape and biodiversity; and Transport. This approach can be informed by the case law set out below.

Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J

The Calverton PC case sets out the following five matters for consideration to lead to the planning judgments as to whether there are exceptional circumstances regarding the release of Green Belt land through the local plan process in a particular case having determined the objectively assessed need (para 51)

- (i) the acuteness/intensity of the objectively assessed need;
- (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development;
- (iii) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- (iv) the nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
- (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable

Principles i. and ii. apply District wide. Principles iii. iv. and v. are site specific and should be considered in the screening of the parcels.

Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J

Preparing a new local plan is not, of itself, an exceptional circumstance justifying alteration to a Green Belt boundary. There is a considerable amount of case law on the meaning of "exceptional circumstances" in this context. In particular: Carpets of Worth Limited v Wyre Forest District Council (1991) 62 P & CR 334, Laing Homes Limited v Avon County Council (1993) 67 P & CR 34 COPAS v Royal Borough of Windsor and Maidenhead [2001] EWCA Civ 180; [2002] P & CR 16 and R (Hague) v Warwick District Council [2008] EWHC 3252 (Admin)

From these authorities, many propositions are clear and uncontroversial.

(i) Planning guidance is a material consideration for planning plan-making and decision-taking. However, it does not have statutory force: the only statutory obligation is to have regard to relevant policies

(ii) The test for redefining a Green Belt boundary has not been changed by the NPPF. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans (e.g. paragraph 2.7 of PPG2: paragraph 83 above), and has always required "exceptional circumstances" to justify a revision. The NPPF makes no change to this

(iii) Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green

(iv) Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration"

As part of Dacorum Borough Council's approach to the Green Belt release it undertook a Green Belt Purpose Assessment in 2 parts. Parcels of land have been considered through this assessment and in relation to Kings Langley, Green Belt parcel GB14B was assessed as meeting only two out of the five purposes of Green Belt designation.

See figure attached

However, the Green Belt Review Purposes Assessment has not demonstrated any 'exceptional' or 'very special' circumstances to demonstrate why part of the Green Belt should be released. The KL&DRA does not agree with the outcomes of this report or its recommendations for the potential release of land from the Green Belt.

The approach has not considered the potential merging of 1st, 2nd and 3rd settlements and has mainly focused on the potential merging of 1st tier settlements with other 1st tier settlements.

The approach to the release of Green Belt land has not considered the impact on infrastructure or the effect on character for Rucklers Lane and Kings Langley. The sites identified here would lead to the merging of Rucklers Lane and Kings Langley with Hemel Hempstead. This would not comply with the first two purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas (Hemel Hempstead) and prevent neighbouring towns merging into one another (Hemel Hempstead with Kings Langley).

In stage two of the Green Belt Review it was concluded that Green Belt parcel GB14B only partially prevents neighbouring towns from merging. The Green Belt is however, instrumental in separating Rucklers Lane and Kings Langley from Hemel Hempstead and therefore

has a significant role in preventing neighbouring towns and villages from merging with each other.

The KL&DRA also challenges the Green Belt Review conclusion that GB14B has a partial role to assist in safeguarding the countryside from encroachment. GB14B protects the surrounding countryside around Kings Langley. There has been some development within GB14B, but this development is for acceptable use within the Green Belt, for example sport and recreation - a golf course which preserves the openness of the Green Belt here. Rucklers Lane was cited within the Stage Two Green Belt Review as '*extensive ribbon development*'. Most houses along Rucklers Lane were built before Green Belt policy was incorporated into the Town and Country Planning Act 1947 and designation which only started to take place in the in 1950s. This would explain why Rucklers Lane has remained a ribbon development and has not further encroached into Kings Langley or Hemel Hempstead.

The Green Belt parcel is rural and reflective of the surrounding countryside in character. There are many pockets of deciduous woodland within GB14B and these are protected by the Green Belt. The KL&DRA disagrees that this parcel of land within the Green Belt only partially assists in safeguarding the countryside from encroachment and that its role as such should be changed to significant.

KL&DRA disagrees that the loss of land from the Green Belt here will promote sustainable patterns of development. Paragraph 84 of the NPPF states: '*When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.*'

Currently Dacorum's approach to Green Belt does not reflect paragraph 84 of NPPF. There should be more focus on key towns which are best placed to provide the full range of facilities and services required for sustainable living. Rather than channelling development towards villages such as Kings Langley where services and facilities are to a degree, limited, the focus should be on the main towns of Hemel Hempstead, Tring and Berkhamsted.

Neither will removal of this land from the Green Belt comply with the final purpose - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The consequence of removing this land from the Green Belt would be to place extra pressure to build in the Green Belt. Rather it is important to make efficient use of available land (i.e. previously developed land and land within the urban areas and to develop these at the highest density appropriate to the locality in question). It is not considered that the approach outlined within the I&O paper has adequately taken this purpose into account as it fails to demonstrate what efforts have rigorously taken place to make best

use of brownfield site or underused land within settlements.

The Housing White paper 'Fixing our Broken Housing Market' (February 2017) re-emphasises that part of the test to demonstrate 'exceptional circumstances' requires all other reasonable options to have been considered first before Green Belt boundaries are amended. The White Paper states:

'We propose to amend and add to national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:

- making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;*
- the potential offered by land which is currently underused, including surplus public-sector land where appropriate;*
- optimising the proposed density of development; and*
- exploring whether other authorities can help to meet some of the identified development requirement.'*

The current approach has not explored all the options above and it has failed to observe PPG which asks: "Do housing and economic needs override constraints on the use of land such as Green Belt?" and states: "The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up the local plan." The approach which should be taken is to have regard to a wide range of factors summarised as criteria under the five headings of Local Plan Strategy: Green Belt, Sustainable Place-making, Design, Landscape and Biodiversity and Transport. For example, part of Kings Langley lies within Three Rivers District. However, the scope as to whether any of the land within Three Rivers could be brought forward, through the Duty to Cooperate, help to meet the local housing needs within Dacorum generally, or Kings Langley specifically has not been fully explored.

One such opportunity exists on land north of Master Yard (also known as the Kings Langley Employment Area) which offers a potential redevelopment opportunity for approximately 100 dwellings on a brownfield site. This opportunity should be fully explored to help meet Dacorum's identified development requirement. This is just one potential option which would lead to a reduced need for development within the Green Belt. A further significant opportunity is the efficient and effective use of underused and undeveloped employment land at Maylands Industrial Estate including the People building – plots 1 and 2 currently vacant and adjacent land, not yet with planning permission. A review of this employment area therefore needs to be carried out to ascertain whether there is scope for re-allocation for residential use.

	<p><u>QUESTION 9 Approach to Green Belt and Major Development Sites - Summary Representation and Response Sought:</u></p> <p>It is not considered that a sufficiently robust exercise has taken place to justify releasing any sites from the Green Belt. Further work needs to be undertaken to investigate the potential yield from existing brownfield sites or from opportunities arising from the Duty to Cooperate. As such no consideration should be given to releasing Green Belt sites until this has been achieved.</p>
Include files	Jane Terry - REPS - figure 1 - Response to DBC Local Plan Issues and Options Consultation FINAL - Kings Langley - Figure 1.pdf
Number	Question 9
ID	LPIO22098
Full Name	Crest Nicholson
Company / Organisation	
Position	
Agent Name	Sarah Moorhouse
Company / Organisation	Lichfields
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please see Appendix 4 (Green Belt analysis) 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 which identifies a number of concerns with the Green Belt evidence base progressed so far.
Include files	Sarah Moorhouse Crest Nicholson-15426 Land adj. to Blegberry Gdns, Berkhamsted Reprs (13.12.17).PDF
Number	Question 9
ID	LPIO22125
Full Name	Mrs Hayley 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 9
ID	LPIO22169
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 9
ID	LPIO22213
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 9
ID	LPIO22254
Full Name	Bruce Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated</p>

in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

Para87

“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

Include files	
Number	Question 9
ID	LP1022258
Full Name	Mr & Mrs Hutton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted</p>

	<p>previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.</p> <p><i>Para BB</i></p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LP1022262
Full Name	Mr & Mrs Gray
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p>

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

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“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations”.

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

Include files	
Number	Question 9
ID	LP1022266
Full Name	Mr & Mrs Shaw
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation</p>

	<p>from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.</p> <p><i>Para BB</i></p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LPIO22270
Full Name	Mr & Mrs Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The</p>

	<p>sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.</p> <p><i>Para BB</i></p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LPIO22274
Full Name	Hassan & Caroline Farran & Jarrett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

Para87

“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

Include files	
Number	Question 9
ID	LPIO22278
Full Name	Mr & Mrs de Lisle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED]

██████ (as coordinator on behalf of residents of Ivy House Lane). (see below)

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

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"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

Include files	
Number	Question 9
ID	LPIO22282
Full Name	Adam & Ruth Trigg & Barrett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

Para87

"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

Include files

Number

Question 9

ID

LPIO22286

Full Name

Mr & Mrs Henderson

Company / Organisation

Position

Agent Name

Company / Organisation

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".</p> <p><i>Para BB</i></p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LPIO22290
Full Name	Mr & Mrs McGregor
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".</p> <p><i>Para BB</i></p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LPIO22294
Full Name	Mr& Mrs Adams

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".</p> <p>Para BB</p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9

ID	LPIO22298
Full Name	Mr & Mrs Butcher
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".</p> <p><i>Para BB</i></p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>

Include files	
Number	Question 9
ID	LPIO22302
Full Name	Emma & Elizabeth Pemberton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".</p> <p><i>Para BB</i></p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p>

	Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.
Include files	
Number	Question 9
ID	LPIO22306
Full Name	Mr & Mrs Ostle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Mr & Mrs Ostle:</p> <p>Much of the proposed planning for Berkhamsted is in existing Greenbelt land. In his recent budget speech, the Chancellor Philip Hammond said that the Conservatives would strongly defend the Greenbelt, to enthusiast applause from both sides of the House. An extract from Hansard online dated 22 Nov Volume 631 says;</p> <p><i>“Solving the housing challenge takes more than money—it takes planning reform. We will focus on the urban areas where people want to live and where most jobs are created, making best use of our urban land and continuing the strong protection of our green belt, in particular building high quality, high density homes in city centres and around major transport hubs”</i></p> <p>The current Proposals concerning Berkhamsted and Tring appear to run totally at odds with several of the objectives and commitments above, and also with a letter from the Department of Communities and Local Government, dated June 2016, the Minister of State for Housing and Planning, Brandon Lewis, states that</p> <p><i>“. . . Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people.”</i> If, after these and other statements, existing Greenbelt land is merely de-registered as such and then built on, it would be seen as a cynical and duplicitous act and will further alienate public respect for politicians and for the Planning Authorities</p> <p>Neil Aitchison and Philip Jones:</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted</p>

	<p>previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan- evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p>Para87 “As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.</p> <p>Para BB "When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LP1022310
Full Name	Mr & Mrs Wotherspoon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through</p>

	<p>unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.</p> <p><i>Para BB</i></p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LP1022314
Full Name	Mr & Mrs Champion
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC</p>

state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

Para87

“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

Include files	
Number	Question 9
ID	LP1022318
Full Name	Mr & Mrs Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p>

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

Para87

“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

Include files	
Number	Question 9
ID	LP1022322
Full Name	Mr & Mrs Eustace
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation</p>

	<p>from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.</p> <p><i>Para BB</i></p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LPIO22326
Full Name	Mr & Mrs Rasiah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In this regard I support the succinct statements made by Mr.Neil Aitchison representing residents of [REDACTED] Lane, Mr.Phillip Jones representing the Hunters Park residents and Mr.Bruce Morris representing primarily the residents of Brackenhill and would urge Council to consider their weighted evidence.

We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). (see below)

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

Para87

“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

Include files	
Number	Question 9
ID	LPIO22331
Full Name	Philip Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	BTC's Consultation <i>response</i> summary refers to a letter from <i>the</i> Department of <i>Communities and Local Government</i> , <i>dated</i> June 2016, <i>by the Minister of State</i> for Housing <i>and</i> Planning, Brandon Lewis, <i>stating</i> that". . . Green Belt <i>boundaries</i> should be <i>adjusted</i> only in exceptional circumstances, <i>through</i> the Local Plan <i>process</i> and <u>with the support of local people.</u> " From the <i>reaction</i> of local <i>residents</i> to the proposed sites <i>in</i> Berkhamsted <i>this support is definitely</i> lacking and <i>should</i> be given <i>heavy weighting in</i> determining whether sites are <i>included</i> in the draft Local Plan.
Include files	
Number	Question 9
ID	LPIO22392
Full Name	Mr Neil Aitchison
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES AND OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars, but the essence is carried through unchanged. I would particularly draw your attention to paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt</p>

	<p>and should not be approved except in very exceptional circumstances".</p> <p>Para BB</p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site</p>
Include files	
Number	Question 9
ID	LPIO22397
Full Name	Mr & Mrs Goddard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A ISSUES AND OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p>

	<p><i>Para87</i></p> <p>“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.</p> <p>Para BB</p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LPIO22401
Full Name	Mr & Mrs Sewell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES ANO OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the</p>

	<p>reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.</p> <p>Para BB</p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LPIO22405
Full Name	Mr & Mrs J Forrester
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES ANO OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green belt Policy. DBC state that their assessment has to be governed by the</p>

	<p>National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.</p> <p><i>Para BB</i></p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LPIO22409
Full Name	Man & Mrs Forster
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES ANO OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation</p>

	<p>from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.</p> <p>Para BB</p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LP1022413
Full Name	Mr & Mrs J Riddle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES AND OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p>

	<p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>The next question to address is whether there should be a different interpretation of Green belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-</p> <p><i>Para87</i></p> <p>“As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances”.</p> <p><i>Para BB</i></p> <p>"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".</p> <p>Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.</p>
Include files	
Number	Question 9
ID	LP1022417
Full Name	Mr & Mrs M Avern
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A

ISSUES AND OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL

AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

The next question to address is whether there should be a different interpretation of Green belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

Para87

"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

Include files	
Number	Question 9
ID	LPIO22456
Full Name	Ashleigh Michnowiec
Company / Organisation	Harrow Estates plc
Position	
Agent Name	Mrs Sam Ryan

Company / Organisation	Turley Estates
Position	Director
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Harrow Estates plc agrees with paragraph 5.2.6 of the consultation document that <i>'whether or not particular areas of land meet Government criteria for Green Belt designation is not the only consideration for growth locations'</i> and it is also necessary <i>'to consider how sustainable these areas would be if they were developed'</i>.</p> <p>Exceptional circumstances clearly exist in the borough to justify amending Green Belt boundaries as required by the Framework. In those circumstances, the contribution that individual sites make to the purposes of Green Belt is only one relevant consideration to be taken into account and Harrow Estates plc supports the council's proposed approach to addressing Green Belt objectives 'in the round'.</p>
Include files	
Number	Question 9
ID	LPIO22457
Full Name	Ashleigh Michnowiec
Company / Organisation	Harrow Estates plc
Position	
Agent Name	Mrs Sam Ryan
Company / Organisation	Turley Estates
Position	Director
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Harrow Estates plc agrees with paragraph 5.2.6 of the consultation document that <i>'whether or not particular areas of land meet Government criteria for Green Belt designation is not the only consideration for growth locations'</i> and it is also necessary <i>'to consider how sustainable these areas would be if they were developed'</i>.</p> <p>Exceptional circumstances clearly exist in the borough to justify amending Green Belt boundaries as required by the Framework. In those circumstances, the contribution that individual sites make to the purposes of Green Belt is only one relevant consideration to be taken into account and Harrow Estates plc supports the council's proposed approach to addressing Green Belt objectives 'in the round'.</p>
Include files	
Number	Question 9
ID	LPIO22480
Full Name	Mr & Mrs Wotherspoon
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We write to object to the potential development in the Ivy House Lane field. Our views are those of Mr and Mrs Ostle and their letter of 13/12 17. We agree fully with their position and agree with all they say (see below).</p> <p>Much of the proposed planning for Berkhamsted is in existing Greenbelt land. In his recent budget speech, the Chancellor Philip Hammond said that the Conservatives would strongly defend the Greenbelt, to enthusiast applause from both sides of the House. An extract from Hansard online dated 22 Nov Volume 631 says;</p> <p><i>“Solving the housing challenge takes more than money—it takes planning reform. We will focus on the urban areas where people want to live and where most jobs are created, making best use of our urban land and continuing the strong protection of our green belt, in particular building high quality, high density homes in city centres and around major transport hubs”</i></p> <p>The current Proposals concerning Berkhamsted and Tring appear to run totally at odds with several of the objectives and commitments above, and also with a letter from the Department of Communities and Local Government, dated June 2016, the Minister of State for Housing and Planning, Brandon Lewis, states that</p> <p><i>“. . . Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people.”</i></p> <p>If, after these and other statements, existing Greenbelt land is merely de-registered as such and then built on, it would be seen as a cynical and duplicitous act and will further alienate public respect for politicians and for the Planning Authorities.</p>
Include files	
Number	Question 9
ID	LP1022490
Full Name	Mr & Mrs Lisa-Lotte & Henrik Hansen
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 below our response to the new Local Plan consultation. I fully support Brag’s response on this matter (see below)</p> <ul style="list-style-type: none"> • Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should

	<p>be large and self-supporting – perhaps revisit village boundaries.</p> <ul style="list-style-type: none"> • Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG’s full response to the Stage 1 Green Belt Review https://www.southcambridgeshire.gov.uk/2013/07/24/brag-response-to-stage-1-green-belt-review/ • Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong. • Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations • Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been – assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do. • The Inspector’s report [July 2013] records “it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.”
Include files	
Number	Question 9
ID	LPIO22529
Full Name	Mr & Mrs Lisa-Lotte & Henrik Hansen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We believe the Green Belt Review is fundamentally flawed. Any adjustments in Green Belt should have been completed before deciding which sites to consider for further housing development. The TRL assessment of individual sites is superficial, biased, lacks any real analysis of the impact development has on the specific

	<p>area in which they are situated and is on several accounts simply wrong. Development on Green Belt cannot offer any net environmental improvements, - the net effect can only be negative regardless of size. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Review produced by consultants whose vague reasoning is completely at odds with the current Green Belt policy.</p> <p>Asking developers to put sites forward is ineffective and unprofessional. Their primary incentive is naturally to propose sites that will maximise their profitability.</p>
Include files	
Number	Question 9
ID	LPIO22540
Full Name	Mrs C Longbottom
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 support all answers and comments to the Issues & Options Consultation document noted on the Berkhamsted Town Council website</p> <p>This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas.</p> <p>Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided.</p> <p>Both stages of the Green Belt Review are flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review http://www.berkhamstedtowncouncil.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf</p> <p>Previous conclusions on the important role of the Green Belt by a series of Planning Inspectors have been ignored in favour of the Green Belt Reviews produced by consultants whose starting point appears to be an assumption that current Green Belt policy is wrong.</p> <p>We strongly agree with 5.2.6 about the need to consider the sustainability of proposed sites</p> <ul style="list-style-type: none"> • infrastructure, accessibility, health and well-being issues are all crucial. Consideration of the impact on the character of each town or village is also <p>We note the Inspector's Report to Dacorum Borough Council [PINS/A1910/429/4, July 2013] which states, with reference to Market Towns, "...However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the</p>

	Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town". [para 39]
Include files	
Number	Question 9
ID	LPIO22610
Full Name	Mr & Mrs Mehew
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>Berkhamsted Town Council Response:</p> <p>This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas.</p> <p>Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided.</p> <p>Both stages of the Green Belt Review are flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (http://www.norfolk.gov.uk/content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf).</p> <p>Previous conclusions on the important role of the Green Belt by a series of Planning Inspectors have been ignored in favour of the Green Belt Reviews produced by consultants whose starting point appears to be an assumption that current Green Belt policy is wrong.</p> <p>We strongly agree with 5.2.6 about the need to consider the sustainability of proposed sites</p> <ul style="list-style-type: none"> • infrastructure, accessibility, health and well-being issues are all crucial. Consideration of the impact on the character of each town or village is also

	We note the Inspector's Report to Dacorum Borough Council [PINS/A1910/429/4, July 2013] which states, with reference to Market Towns, "...However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town". [para 39]
Include files	
Number	Question 9
ID	LPIO22659
Full Name	Mr Kevin Rolfe
Company / Organisation	
Position	Group director
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><u>Minor Green Belt realignment to North of Coniston Road Kings Langley</u></p> <p>I understand, that unlike the last local plan review, when there was a core strategy document which dealt with major strategic sites and green belt changes, followed by the site allocations document which dealt with smaller sites, that this time around there will just be one single plan.</p> <p>Therefore, whilst my representation is in relation to a proposed minor green belt adjustment it is necessary for it to be submitted at this stage.</p> <p>I would like to make clear that I am not making a submission for a proposed housing site via this consultation or via the call for sites, I am merely seeking a logical, small realignment of the current green belt boundary, which is an arbitrary line at present , put simply it is an anomaly.</p> <p>The location of the area in question is the existing rear gardens to the north of the houses in Coniston Road Kings Langley , see attached.</p> <p>The current inappropriate green belt boundary line is shown on the next plan (on attached) taken from the adopted proposals map.</p> <p>You will see from the comparison of the 2 plans above that the current green belt boundary bisects long established rear gardens of the houses . In the vast majority of cases it runs straight across the gardens at an arbitrary point that have no specific physical features on the ground.</p> <p>In reality the entire length of these gardens, extending down to a fully established boundary with the field to the North, are in ancillary residential use as gardens and are used accordingly with the usual residential paraphernalia. The full extent of these gardens sit within</p>

	<p>the built up area of the village as opposed to in the countryside or in open agricultural land.</p> <p>The green belt boundary should therefore be amended to exclude the green area as per the plan attached</p> <p>I am fully conversant with the five purposes of the Green Belt defined within the NPPF.</p> <p>It is very clear that the current boundary line does meet any of these criteria and that the appropriate permanent and fully defensible boundary should be the moved to the established field boundary to the North to follow the line of the rear of all these gardens.</p> <p>At this time, very substantial green belt boundary changes and site allocations are being proposed in Kings Langley and across Dacorum as a whole.</p> <p>It would be inappropriate if such large amendments were to be made without also ensuring that the existing line is fit for purpose and that any historical small scale anomalies are remedied.</p> <p>Furthermore via the last site allocations document DBC implemented another minor green belt boundary change at the other end of Coniston Road which did not include land already in residential use like it is in this case.</p> <p>In light of the above I would respectfully request that DBC progress this suggested minor realignment to remove the current anomaly and realign the Green Belt boundary to its permanent defensible and logical position at the very end of the current gardens at the Northern boundary with the adjoining agricultural land.</p>
Include files	Kevin Rolfe Green Belt Boundary change.pdf
Number	Question 9
ID	LPIO22686
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><i>Question 9 – Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?</i></p> <p>Yes. If Green Belt is to be released, Dacorum needs to take into account how accessible and sustainable development in that location could be, as referenced in paragraph 5.2.6.</p> <p>The reference to Green Belt as providing opportunities for increased access, growing food and support nature conservation is fully supported. The Landscape Institute is calling for a review of strategic planning policy <i>‘to redefine the purposes of Green Belt, to include a multi-functional role as part of a UK-wide green infrastructure framework and for delivery mechanisms</i></p>

	<i>to be developed to put these changes into action.'</i> Further work with regards to this is anticipated in 2018.
Include files	
Number	Question 9
ID	LPIO22797
Full Name	Mr Patricia Wheway
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 NPPF paragraph 79 states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open”</p> <p>The NPPF defines five purposes of Green Belt as follows:</p> <ol style="list-style-type: none"> 1 To check the unrestricted sprawl of large built-up areas 2 To prevent neighbouring towns merging into one another 3 To assist in safeguarding the countryside from encroachment 4 To preserve the setting and special character of historic towns 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land <p>Gallagher Homes v Solihull BC 2014</p> <p>Preparing a new local plan is not of itself an exceptional circumstance justifying alteration to a green belt boundary.</p> <p>In addition, the chancellor in his Autumn Statement re-inforced the importance of protecting green belt land and focusing on brown field land for housing development.</p>
Include files	

Report Settings Summary

Event	Local Plan Issues & Options November 2017
Total Responses	22,707
Total Respondents	2,376
Filtered Responses	323
Filtered Respondents	315
Questions	<p>Question 10</p> <p>Do you agree with the proposed approach to the Rural Area summarised above?</p> <p>Yes / No</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)	ID-4764247-QUESTION-10
Pivot	<i>(none)</i>
Document Name	question 10 - Summary Report
Created on	2019-04-17 07:38:31
Created by	Strategic Planning Admin

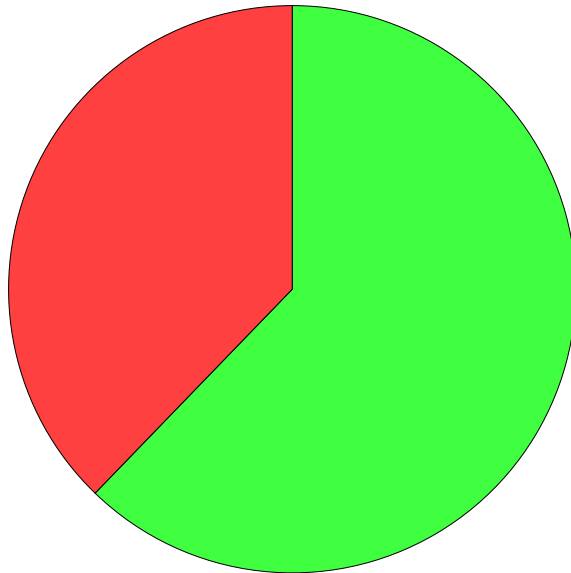
Your Opinion

Question responses: 323 (100.00%)

Question 10

Do you agree with the proposed approach to the Rural Area summarised above?

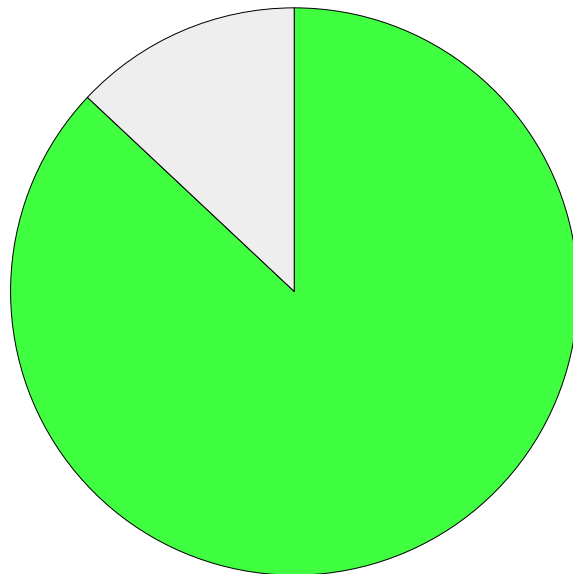
Yes / No



	% Total	% Answer	Count
Yes	62.23%	62.23%	201
No	37.77%	37.77%	122
Total	100.00%	100.00%	323

Responses

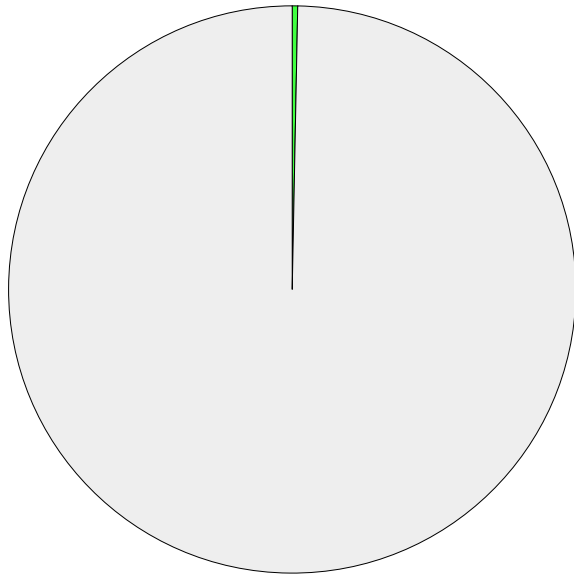
Question responses: **281 (87.00%)**



	% Total	% Answer	Count
■ Responses	87.00%	100.00%	281
■ No Response	13.00%	--	42
Total	100.00%	100.00%	323

Supporting evidence

Question responses: 1 (0.31%)



	% Total	% Answer	Count
■ Responses with File(s) Uploaded	0.31%	100.00%	1
■ Responses with No Uploads	99.69%	--	322
Total	100.00%	100.00%	323

Issues and Options All Responses to Question 10

Number	Question 10
ID	LPIO79
Full Name	Mr John Lilley
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 10
ID	LPIO164
Full Name	Mr John Shaw
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Both the rural areas and the green belt should be treated the same. There should be no development on either as they are there to protect the area from urban sprawl.
Include files	
Number	Question 10
ID	LPIO212
Full Name	Mr Martin Cotton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	As long as defence of the Green Belt is robust and unflinching.
Include files	
Number	Question 10
ID	LPIO325
Full Name	Mr David Stanier
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The main issue is that the approach is good , but the implementation does not follow the ideas. Working farmland is important and should not be built on.
Include files	
Number	Question 10
ID	LPIO448
Full Name	Ms Julia Marshall
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 10
ID	LPIO485
Full Name	Susan Justice
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	These areas should only be treated in the same was as green belt if the green belt is to be protected. AONBs need to be particularly protected from development.
Include files	
Number	Question 10
ID	LPIO540
Full Name	Mrs Sarah West
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 10
ID	LPIO583
Full Name	Georgina Tregoning
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	In particular, the AONB areas should continue to have the highest level of protection.
Include files	
Number	Question 10
ID	LPIO619
Full Name	Mrs Carole Stokes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Rural and Green belt should be treated the same, and no development allowed on either.
Include files	
Number	Question 10
ID	LPIO647
Full Name	Mrs Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The AONB should continue to have the highest level of protection
Include files	
Number	Question 10
ID	LPIO662
Full Name	Mr David Smith
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 10
ID	LPIO858
Full Name	Mr Stephen Bevan
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 10
ID	LPIO955
Full Name	Mr Robin Knowles
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The rural areas should be treated the same as the green belt
Include files	
Number	Question 10
ID	LPIO1002
Full Name	Mr Dominic Lawrance
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The Rural Area and the Green Belt both deserve the highest level of protection.
Include files	

Number	Question 10
ID	LPIO1024
Full Name	mr Tish Seabourne
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 10
ID	LPIO1074
Full Name	Ms Tish Seabourne
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 10
ID	LPIO1176
Full Name	Mr John Ingleby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Without a clear explanation of revised Green Belt policies, the treatment of Rural Areas (i.e. in the same way as Green Belt land) is also inadequate.
Include files	
Number	Question 10
ID	LPIO1202
Full Name	Mr Bernard Richardson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But this proposed approach must be strictly observed.
Include files	
Number	Question 10
ID	LPIO1261
Full Name	Sarah Harper
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	If the Council designated it as Green Belt I wonder it would offer any more protection given the intended development.
Include files	
Number	Question 10
ID	LPIO1420
Full Name	Ms G Puddiphatt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Development of all Rural and Green Belt land should be Excluded from the Local Plan. There will be enough options in other areas, for devel of affordable housing, if the borough can be bothered to better explore options and opportunities. Even if these options cost more money.
Include files	
Number	Question 10
ID	LPIO1573
Full Name	Linda Hattersley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	Yes - you must uphold the AONB and the Green Belt designations - they are there for very good reasons.
Include files	
Number	Question 10
ID	LPIO1603
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 10
ID	LPIO1663
Full Name	Mr Peter Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Generally, rural areas have very poor access.
Include files	
Number	Question 10
ID	LPIO1675
Full Name	Jenny Thorburn
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 10
ID	LPIO1736
Full Name	Mr Kenneth Watts
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 10
ID	LPIO1763
Full Name	Mr Craig Wiggill
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 10
ID	LPIO1782
Full Name	Mrs Pamela Kingsland
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 10
ID	LPIO1817
Full Name	Mr Richard Case
Company / Organisation	
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"> It is essential that we retain and strengthen existing policies in respect of the Chitern AONB
Include files	
Number	Question 10

ID	LPIO1917
Full Name	Miss teresa finnigan
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 10
ID	LPIO2015
Full Name	Mrs Christine Mabley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The rural area deserves better transport links East-West as currently it rat runs south through narrow lanes
Include files	
Number	Question 10
ID	LPIO2048
Full Name	Mr Christopher Giddings
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 council should promote this 'rural area' for self builders and insist that only homes that meet the highest and most efficient design standards be built on it.</p> <p>These villages suffer from a lack of shops, pubs and services as they are being preserved in aspic, small scale development will help ensure they have a long term future.</p> <p>Therefore the land should be considered similar to the green belt but enable small scale development that will enhance the look and feel of the area and prevent the villages from being small housing outposts with no community facilities.</p>
Include files	

Number	Question 10
ID	LPIO2309
Full Name	Mr David Glenister
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Rural Area - Chiltern Area of Outstanding Natural Beauty should be protected and not be considered the same way as Green Belt. It is vital to conserve this land for nature and country pursuits (walking, cycling, nature study) Once these sites are "accessed" beyond their current level it will consequently open up the land to development which will thus impact on the fauna and flora and the area of outstanding natural beauty. This is not acceptable and we should be protecting these areas for future generations to enjoy.
Include files	
Number	Question 10
ID	LPIO2314
Full Name	Mr George Bull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	In the Tring area, where an ancient town sits at the edge of Chiltern beech woods, both Green Belt and the rural area merit protection.
Include files	
Number	Question 10
ID	LPIO2370
Full Name	Dr Nick Hodsdon
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 10

ID	LPIO2376
Full Name	Mr Paul Crosland
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The Chilterns AONB should continue to be protected from direct and indirect effects of development.
Include files	
Number	Question 10
ID	LPIO2461
Full Name	Mr Timothy Copeman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The term broadly is used which is not clearly defined, both need to be assessed equally.
Include files	
Number	Question 10
ID	LPIO2538
Full Name	Mrs Margaret Stanier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Whereas this approach is broadly commendable, the original purpose of the Green Belt, which is to stop urban sprawl, should not be forgotten. Treating Green Belt land in the same way as other rural areas does nothing to address this issue.
Include files	
Number	Question 10
ID	LPIO2579
Full Name	Mrs Marriott
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Not enough information available about where these area boundaries are located to provide more specific comments.
Include files	
Number	Question 10
ID	LPIO2730
Full Name	Mr James Puddiphatt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt and rural land must be left alone
Include files	
Number	Question 10
ID	LPIO2789
Full Name	mrs Gillian Hooper
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But the designation must be enforced.
Include files	
Number	Question 10
ID	LPIO2847
Full Name	Mr Paul Mcpherson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Development of green belt land should be excluded from the plan
Include files	

Number	Question 10
ID	LPIO2864
Full Name	Mr Antony Harbidge
Company / Organisation	Berkhamsted Residents Action Group (BRAG)
Position	Chairman
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"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO2911
Full Name	Dr Rachael Frost
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The council does not appear to give adequate protection to green belt areas so I doubt that treating rural areas in the same way would offer any more protection. Both should be subject to more stringent protection. Rural areas are too valuable to lose.
Include files	
Number	Question 10
ID	LPIO2938
Full Name	Mr John Lunn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	It is critical for future generations to uphold the AONB and the Green Belt designations - they are there for very good reasons.
Include files	
Number	Question 10
ID	LPIO3032
Full Name	Mr John McCombe

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	With the same caveats as in my response to the previous question.
Include files	
Number	Question 10
ID	LPIO3068
Full Name	mr hugh siegle
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 10
ID	LPIO3142
Full Name	Mr John Walker
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 10
ID	LPIO3195
Full Name	Mrs Alicia Southgate
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 10
ID	LPIO3228
Full Name	Mr George Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Protection of the countryside is very important. If there are environmental and green belt issues then lower development numbers can be deemed to be sound.
Include files	
Number	Question 10
ID	LPIO3313
Full Name	Mrs Victoria Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Only build on Brownfield sites, protect Green Belt and nature
Include files	
Number	Question 10
ID	LPIO3417
Full Name	Mrs Ann Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We are a rural settlement surrounded by open countryside and any development should be restricted to brownfield sites and kept to a minimum.
Include files	
Number	Question 10
ID	LPIO3473
Full Name	Mrs Louise Saul
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	With no development on either
Include files	
Number	Question 10
ID	LPIO3553
Full Name	Mr Robert Bailey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	BUT need special protection for AONB.
Include files	
Number	Question 10
ID	LPIO3569
Full Name	Mrs Sandra Jackson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Areas of outstanding natural beauty should remain untouched, or they lose their beauty. Permitting any kind of development to infringe on these areas is wrong and future generations will lose out.
Include files	
Number	Question 10
ID	LPIO3632
Full Name	Mr Andrew Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Fails to give due consideration to the report by the Chilterns Conservation Board on the Cumulative Impact of Development on the Chilterns AONB.
Include files	
Number	Question 10
ID	LPIO3687
Full Name	MS Nicola Hutton
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 current plan is piecemeal and dependent on landowners offering sites. This leads to considerable distress and negative impact upon residents who are already living in the area in the loss of valuable landscape and opportunities for walking, cycling.</p> <p>Although it would take longer, a more practical option would be to consider building a larger development, new Town where the proper infrastructure can be put in following a proper review of what the local population requires in terms of housing and employment. This would also allow for consideration of the development to be attractive and appealing to the new residents. Good examples are the Garden Cities where there is sensitivity given to landscape as well as building</p> <p>The current plan is rather like a situation where your neighbour extends their house which places you at risk of losing your light so you have to extend your house and so on leading to a house that has lost its original character and appeal. The plans to build housing on green belt sites means either large properties are going to be built which hardly addresses the requirements for affordable housing, or high density, high rise building is going to take place which will have a significant impact upon the existing residents who have enjoyed beautiful landscape and who will in future be looking at a brick wall.</p>
Include files	
Number	Question 10
ID	LPIO3733
Full Name	Mr Richard Sidwell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	So if you're taking same approach to rural areas as green belt land, that implies you consider it fair game for development. No thank you.
Include files	
Number	Question 10
ID	LPIO3959
Full Name	Mr Tim Varley
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 10
ID	LPIO4032
Full Name	Mr Alan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Kings Langley is a village surrounded by open countryside and this is part of the village's character. The current proposals are situated on the periphery of Kings Langley and are set in the open countryside and this approach should be reviewed to remove greenfield sites in preference for brownfield development in and around Kings Langley. Dacorum should optimise the proposed density of development (as per the Autumn statement) in Hemel, Berkhamsted and Tring, and explore if other authorities can help to meet some of the identified development requirement.
Include files	
Number	Question 10
ID	LPIO4033
Full Name	Mr Oliver Fairfull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Cycle lanes in the county are non-existent or are poorly maintained. In particular the cycle path to Tring station. With the station 2 miles out of town, with a bus service which is unreliable and a car park which is expensive and commonly full, the alternative is to cycle. However, the path is poorly maintained and completely unlit, making it dangerous and unusable throughout late autumn to early spring for anyone commuting during rush hour.
Include files	
Number	Question 10
ID	LPIO4122
Full Name	Mr Graham Hoad
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Appropriate rural craft industries carried out in sensitive manner using redundant vernacular buildings would be acceptable.
Include files	
Number	Question 10
ID	LPIO4347
Full Name	Mr Adrian Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We should protect and retain the Rural Area status.
Include files	
Number	Question 10
ID	LPIO4352
Full Name	Mr Adrian Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Rural Area protection policy should be non negotiable.

Include files	
Number	Question 10
ID	LPIO4375
Full Name	Mrs Kate Quaite
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Rural area and Green Belt should be given same respect and protection from further development.
Include files	
Number	Question 10
ID	LPIO4554
Full Name	Dr Alasdair Malloy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There are Green Belt areas south of Hemel Hempstead which are implicated in this proposal. There should be no intention whatsoever to build anywhere on the Green Belt while there are Brown Field sites which have not been considered.
Include files	
Number	Question 10
ID	LPIO4564
Full Name	Dr Alasdair Malloy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The development of all Rural and Green Belt land should be removed from the plan.
Include files	
Number	Question 10
ID	LPIO4597
Full Name	Mrs Caroline Nickalls

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	AONB and the Green Belt both deserve the highest level of protection.
Include files	
Number	Question 10
ID	LPIO4682
Full Name	Mr Keith Bradbury
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 10
ID	LPIO4762
Full Name	Mrs Joanna Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	All AONB must be protected and rural developments never have effective transport links,
Include files	
Number	Question 10
ID	LPIO4838
Full Name	Mr Simon Scott
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 10
ID	LPIO4900
Full Name	Mr Padraig Dowd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As for previous question.
Include files	
Number	Question 10
ID	LPIO5018
Full Name	Mr Chris Lumb
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 10
ID	LPIO5207
Full Name	Mr Gareth Morris
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 10
ID	LPIO5238
Full Name	Mrs Catherine Anderson
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 10
ID	LPIO5246
Full Name	Mr Nicholas Ring
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 10
ID	LPIO5247
Full Name	Mr Nicholas Ring
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 10
ID	LPIO5314
Full Name	Miss Giulietta Cinque
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Rural areas and Green belt should be treated the same, and no development allowed on either. It needs to be protected for future generations to enjoy as we do now.
Include files	
Number	Question 10
ID	LPIO5477
Full Name	Mr Garrick Stevens

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes, but the Chilterns AONB needs specific policy protection.
Include files	
Number	Question 10
ID	LPIO5538
Full Name	Mr Bob Hattersley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	You appear to be saying that you will treat the AONB as no more significant than Green Belt. That cannot be right. The AONB is a national treasure which we hold in trust for future generations.
Include files	
Number	Question 10
ID	LPIO5591
Full Name	
Company / Organisation	Village Foundations
Position	
Agent Name	Mr Nick Wyke
Company / Organisation	Gade Group
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Sites within the rural area should not be treated the same as the Green Belt and be seen as inappropriate locations for new development except in exceptional circumstances. Taking such as restrictive approach in allowing villages to grow and develop risks leaving these settlements as dormant communities. Without new development villages, will not grow and proposer and services within the rural area will close making them less sustainable to new development. Through high quality design that reflects the appearance of the local area residential development in rural areas can be appropriate. New housing of the right type and size not only helps residents to stay and grow in the

	<p>village but also supports facilities and services that have suffered or even been lost as we witness the closure of the post office and shop and other facilities.</p> <p>Research shows that many of the arguments about new housing in villages being less sustainable are untrue. For example carbon emissions from commuters in towns and cities can be higher as those residents often create more emissions and have longer journey times due to the higher levels of traffic congestion and delays.</p> <p>It is possible today to buy a new home that generates renewable power and actually supplies the grid with excess energy. The battery powered cars are award winning and a genuine replacement vehicle for 95% of the population. With broadband and new ways of working, more people are working from home and or on flexible hours.</p> <p>So times have changed. Technology and demographics move on. Village Foundations calls for more realistic and helpful policies for rural areas and villages, in order to tackle real and pressing social and demographic issues. Subject to the above changes the local plan will be sound and form an effective tool in guiding development.</p>
Include files	
Number	Question 10
ID	LP105720
Full Name	Mr Alastair Greene
Company / Organisation	Little Gaddesden Parish Council
Position	Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The draft Settlement Hierarchy Study suggests that consideration should be given as to whether Little Gaddesden should be designated as a small village. The Parish Council is of a view that it should remain as an undesignated village. The infrastructure i.e. poor access roads, lack of services with frequent power cuts and water supply failures, lack of a credible public transport system, no doctors or dentists or public library (mobile library terminated) is hardly the place to encourage any development. Lack of local employment means that development would just add to the commuter problems that are already experienced.</p> <p>The settlement hierarchy suggests that development should be:-</p> <p>(a) directed to areas with access to the widest range of essential services and facilities where the need to travel is minimized;</p> <p>(b) distributed in a way that corresponds with the role and service provision of the different settlements and the ability of their infrastructure to cope with additional growth; and</p>

	(c) distributed in such a way that where facilities are not available within individual settlements, they are easily accessible at higher order settlements by a choice of transport modes (that do not rely solely on the private car). Little Gaddesden fails to meet these criteria and for those reasons should remain an undesignated village
Include files	
Number	Question 10
ID	LPIO5733
Full Name	Dr Lucy Murfett
Company / Organisation	Chilterns Conservation Board
Position	Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As a nationally protected landscape, with equal planning status to National Parks, great weight should be given to conserving landscape and scenic beauty of Areas of Outstanding Natural Beauty (set out in the Government's National Planning Policy Framework para 115). The plan should have a section and policy/policies specifically on the Chilterns AONB, distinct from the wider Rural Area. The future of the AONB is a pressing issue of its own, which should be higher profile than the Green Belt or undesignated countryside. Applying the same policy approach to Green Belt/AONB/ wider countryside does not reflect the different purposes (and in the case of AONB, statutory duty) and the different NPPF policies for these areas.
Include files	
Number	Question 10
ID	LPIO5814
Full Name	Mr Michael Lelieveld
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes, but as noted above policies concerning the Chiltern AONB must be retained and strengthened.
Include files	
Number	Question 10
ID	LPIO5853
Full Name	Mr Grahame Partridge

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting.
Include files	
Number	Question 10
ID	LPIO5858
Full Name	Mr Grahame Partridge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	It must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO5917
Full Name	Ms Fiona Coulling
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Sympathetic small scale developments can provide much needed critical mass for small businesses such as "corner shops", pubs, farm and craft shops, restaurants. Older or childless people do not automatically need facilities such as schools and if they have their own transport can prefer rural locations to settle.
Include files	
Number	Question 10
ID	LPIO5982
Full Name	Mr Paul Craig
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 10
ID	LPIO6082
Full Name	Mr Richard Tregoning
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 10
ID	LPIO6094
Full Name	Dr Melvyn Else
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 10
ID	LPIO6180
Full Name	Mr Scott Bennett
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 10
ID	LPIO6255

Full Name	Mr andrew miller
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt & AONB should be preserved to provide a legacy for everyone, young and old.
Include files	
Number	Question 10
ID	LPIO6279
Full Name	Mrs Beryl Irvine
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Leave these areas alone, as stated they are areas of outstanding beauty
Include files	
Number	Question 10
ID	LPIO6349
Full Name	Mrs Clare Joyce
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	See my comments given for the green belt.
Include files	
Number	Question 10
ID	LPIO6395
Full Name	Mrs Rachel Macdonald
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Tring and Berkhamsted have already had more than the recommended house building in recent years. Whereas Hemel has been below average.
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 10
ID	LPIO6396
Full Name	Mrs anna silsby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Same rules should apply. Especially as the area is part of the Chiltern AoONB
Include files	
Number	Question 10
ID	LPIO6447
Full Name	Mr Patrick Walsh
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The AONB and the Green Belt are not fully protected.
Include files	
Number	Question 10
ID	LPIO6537
Full Name	Mr Peter Curtis
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 10
ID	LPIO6566
Full Name	Mrs Gemma Parker

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Rural land does not only have value if there is access to key services and facilities. People need space, and they need choice. Retaining areas of rural land is what provides this.
Include files	
Number	Question 10
ID	LPIO6777
Full Name	Mr Graham Smith
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 10
ID	LPIO6888
Full Name	Bradford Gunn
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 10
ID	LPIO6931
Full Name	Mrs Anna Corrigan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	To place more dwellings in rural areas, away from places of work and main services and amenities does not seem to be very sensible in light of our need to protect the environment and decrease pollution. These sites would create more need for travel, when if placed in towns, these residents would have less distance to go. I would like to see more emphasis placed on the areas that can support these developments and make them successful, not places where the travel issues and infrastructure are already struggling to support the current residents adequately.
Include files	
Number	Question 10
ID	LPIO6937
Full Name	Mrs Anna Corrigan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Developing in larger towns seems to make more sense than swamping the smaller rural areas that will be unable to cope with the traffic and increased pressure on local services and amenities. It also seems more logical to concentrate the task of building these estates for reasons of cost. I believe more effort needs to be made to find the right site to build, rather than taking this pin the tail on the donkey approach to resolve this housing demand.
Include files	
Number	Question 10
ID	LPIO6979
Full Name	mr michael hicks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Specific help should be promoted for the building of small amounts of local housing under the rural exemption scheme. Some funding should be allocated for such projects. This would revitalise the villages by allowing their children to stay in the village supporting and supported by their family and the greater community. These houses should be set up as rental and should be outside of the right to buy schemes.
Include files	
Number	Question 10

ID	LPIO7100
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 & 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 Q10 (FULL DOC ATTACHED TO Q46)</p> <p>Question 10</p> <p><i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <p>But must retain and strengthen existing policies in respect of the AONB</p>
Include files	
Number	Question 10
ID	LPIO7311
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 10 (please note full document is attached to Q46)</p> <p>Question 10</p> <p><i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p>

	Yes <input type="checkbox"/> But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO7387
Full Name	Mr Clive Birch
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 10
ID	LPIO7852
Full Name	Dr Peter Chapman
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 10
ID	LPIO7936
Full Name	Mr Norman Groves
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	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 Q10 But must retain and strengthen existing policies in respect of the AONB
Include files	

Number	Question 10
ID	LPIO7986
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	<i>No comment</i>
Include files	
Number	Question 10
ID	LPIO8432
Full Name	Mr Peter Shell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO8536
Full Name	Mrs Sarah Rees
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	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

	<p>confirmation that we wish DBC to duplicate BRAG's responses under our name.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO8559
Full Name	Helen & Stuart 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>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.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO8612
Full Name	Spencer Holmes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options'

	<p>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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO8653
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- Need to make compulsory the development of brownfield sites. Perhaps make it a condition for developers of large sites to develop some brownfield areas as well.</p> <p>2- The density of housing should be concentrated in Hemel Hempstead, not in areas where it would change their character for ever.</p> <p>3- Have not take due account of Green Belt reviews by Planning Inspectors nor the recent report by the Chilterns Conservation Board.</p>
Include files	
Number	Question 10
ID	LPIO8655
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>Q10</p> <p>No</p> <p>1- see comments 1-3 on Q9.</p> <p>2- Rural areas should have only minimal development, of small or affordable houses, to accomodate young people wishing to stay near their families or continue</p>

	working on the land, and older people in these communities who wish to downsize but stay in the area
Include files	
Number	Question 10
ID	LPIO8726
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>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/we request you accept this as confirmation that I/we wish DBC to duplicate BRAG's responses under my/our name.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO8764
Full Name	gregory lee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Specifically regarding the potential of additional housing on the Shendish area I feel would considerably impact my quality of life in Kings Langley. The rural aspect that the green belt provides has given untold amounts of pleasure to my family over the years. The wildlife in the area is still a constant reminder of why we moved to the specific area of the village and any plans to build houses on this would have a massive impact. I feel the same also with regards to all other green belt areas of the village that housing is being considered for. In my opinion the green belt areas are all extremely important to the make up of the village and mass housing projects would significantly unbalance our community. My suggestion is that all green belt land should remain so and additional</p>

	housing sites and solutions should be sought outside of the green belt.
Include files	
Number	Question 10
ID	LPIO8825
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>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> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO8984
Full Name	David Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	YES
Include files	
Number	Question 10
ID	LPIO9006
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 10
ID	LP109755
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LP109803
Full Name	Mr Paul Wardle
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO9978
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>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> <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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10026
Full Name	Jill Mewha
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10095
Full Name	Melanie Frankel
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10143
Full Name	Natalie Crane
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10200
Full Name	Mr Tim Beeby
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10247
Full Name	John and Jane Beeley
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10297
Full Name	Kathleen Lally
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 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB

Include files	
Number	Question 10
ID	LPIO10345
Full Name	J&P Savage
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>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.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10411
Full Name	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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p>

	<ul style="list-style-type: none"> But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10460
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 & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, <u>I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name</u></p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10510
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p>

	<p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10558
Full Name	Mr Roger Petts
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10605
Full Name	Simon Chilton
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p>

	<p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10655
Full Name	Sally and David Williams
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 register as support for BRAG's submission.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10703
Full Name	Mrs Jenny Jenkins
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB

Include files	
Number	Question 10
ID	LPIO10795
Full Name	Grant Imlah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>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.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10848
Full Name	Sheila Dawkins
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 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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10897
Full Name	Jean Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10946
Full Name	Christopher Stafford
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO10996

Full Name	Mrs Patti Whittle
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p><i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO11043
Full Name	J M Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO11124
Full Name	Cally Emmas
Company / Organisation	
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"> • But must retain and strengthen existing policies in respect of the AONB

Include files	
Number	Question 10
ID	LPIO11171
Full Name	Mr Neil Aitchison
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The rural area villages could be allocated a small number of affordable and open market houses to retain their local economies.
Include files	
Number	Question 10
ID	LPIO11217
Full Name	Jon Rollit
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO11268
Full Name	Kate Locke
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>In addition I would reiterate the extensive points made in the BRAG response to the 'Issues & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO11356
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO11405
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p><i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO11515
Full Name	Ms Eliza Hermann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As with the Chilterns Area of Outstanding Natural Beauty and the Green Belt, the new Local Plan needs to prioritise stronger protections for the undesignated countryside.</p>
Include files	
Number	Question 10
ID	LPIO11594
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO11749
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 & 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>Brag Response to question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10

ID	LPIO11899
Full Name	Janet Mason
Company / Organisation	Berkhamsted Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 10
ID	LPIO11946
Full Name	Dee Sells
Company / Organisation	Markyate Parish Council
Position	Parish Clerk/ RFO
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes <i>We would qualify our agreement to allow that our comments on the Green Belt need to be incorporated for Markyate Parish Council to support assessment of sites in the Rural Area in broadly the same way as those in the Green Belt.</i>
Include files	
Number	Question 10
ID	LPIO11995
Full Name	Mark Behrendt
Company / Organisation	Home Builders Federation
Position	Planning Manager – Local Plans
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Rural areas not in the Green Belt The Council states in paragraph 5.3.2 that they have treated rural areas in a similar way to Green Belt. To continue to take this approach is not appropriate and inconsistent with national policy. Green Belt has a clear and distinct purpose that is not applicable to all rural areas. Development in these areas cannot be considered to have such a restrictive status as is applied to Green Belt. In effect the Council is seeking to extend the Green Belt which the NPPF sets out in paragraph 82 should

	only happen in exceptional circumstances. Decisions on development within rural areas should be made solely on the basis of the appropriate policies in the NPPF.
Include files	
Number	Question 10
ID	LPIO12046
Full Name	David Wilyman
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 & 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 10. Please note full document is attached to Question 46</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12099
Full Name	Colin Blundel
Company / Organisation	Chiltern Society
Position	Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>Given that the Council is likely to allocate land for housing in the Green Belt, we are very concerned about land within the Chilterns AONB being treated in a 'similar way to the Green Belt', suggesting that it could be allocated for development. In order to allow major development in the AONB it would need to meet the requirements of paragraphs 115 and 116 of the NPPF.</p> <p>We would expect the emerging plan to contain a strong policy restricting development in the AONB and then only minor development in existing settlements.</p> <p>Some areas of the Borough are both AONB and Green Belt, so these areas must have a maximum level of protection.</p>
Include files	
Number	Question 10
ID	LPIO12136
Full Name	Ray 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 & 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 10. Please note full document is attached to Q46.</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12202
Full Name	Douglas & Christina Billington
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12281
Full Name	Richard Frankel
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 & 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 10. Please note full document is attached to Question 46.</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12339
Full Name	Mr Brian Kazer
Company / Organisation	Tring in Transition
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 10
ID	LPIO12425
Full Name	Judy Halden
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 & 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 10. Please note full document is attached to Question 46.</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12473
Full Name	Meenakshi Jefferys
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12520
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 & 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 10. Please note full document is attached to Question 46.</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12569
Full Name	mr paul healy
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12619
Full Name	Merrick Marshall
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12668
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>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 our name</p> <p>...</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12716
Full Name	Lorna Ginn
Company / Organisation	
Position	
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12765
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>I wish to comment as follows to the Strategic Options Consultations. In general I follow the comments made by BRAG.</p> <p>...</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12812
Full Name	Ingrid Carola McKenna
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12860
Full Name	Mr Stephen Lally
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.</p> <p>...</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12910
Full Name	Jon Whittle
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO12963
Full Name	Edward Keane
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO13012
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 & 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>BRAG response to question 10 below (full BRAG response see question 46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO13065
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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO13113
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO13179
Full Name	Mr J G Botha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes
Include files	
Number	Question 10
ID	LPIO13366
Full Name	Mrs Christine Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	As long as green belt is untouched.
Include files	
Number	Question 10
ID	LPIO13367
Full Name	Mr Alan Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	As long as green belt is untouched.
Include files	
Number	Question 10
ID	LPIO13447
Full Name	Mrs Catherine Imber
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
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, we request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

	<p>However, we would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Q 10 Do you agree with the proposed approach to the Rural Area summarised above? <u>YES</u></p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO13495
Full Name	Deborah 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>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> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO13550
Full Name	Mr Alan 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	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. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO13603
Full Name	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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO13665
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LP1013730
Full Name	Edward Hatley
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LP1013778
Full Name	Mr Roger Didham
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO13835
Full Name	Alex 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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO14005
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>BRAG response to Question 10 please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO14054
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>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.</p> <p>...</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO14102
Full Name	Sue Elleray

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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO14153
Full Name	Mr Richard White
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 disagree with the Dacorum Local Plan proposals for the reasons stated in the BRAG response</p> <p>...</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO14294
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO14356
Full Name	Mr Humphreys
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 10
ID	LPIO14383
Full Name	Ray 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) 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> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p>

	<p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO14431
Full Name	Giselle Okin
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO14480
Full Name	Mr David Griffin
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>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.</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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO14678
Full Name	Ann Bunn
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 10
ID	LPIO14757
Full Name	Ms Paula Farnham
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 (or will be) responded (ing) in full to the 'Issues & 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.</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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	

Number	Question 10
ID	LPIO14828
Full Name	Bev Mckenna
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 & 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.</p> <p>In addition, I draw attention to some of the most important points within that response.</p> <p>...</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO14875
Full Name	Mr Michael Curry
Company / Organisation	Tring Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>But</p> <p>The proposed approach should not preclude consideration of a new 'village' option to meet the housing need, particularly if the level of housing imposed upon the Borough be such that it cannot realistically be met within the existing settlement hierarchy.</p>
Include files	
Number	Question 10
ID	LPIO14930
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO14980
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB

Include files	
Number	Question 10
ID	LPIO15030
Full Name	Mr & Mrs D A Simmons
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 & 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, <i>in particular our response to Q25.</i></p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO15257
Full Name	Caroline 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 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</p>

	<p>the current character of our beautiful Market Town.</p> <p>BRAG response to Question 10(please note full document is attached to Q46)</p> <p>Question 10: Do you agree with the proposed approach to the Rural Area summarised above?</p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB.
Include files	
Number	Question 10
ID	LPIO15309
Full Name	Mr Alan Conway
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 already responded to the Issues & Options Consultation. I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO15358
Full Name	Sue Wolstenholme
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	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>Standard BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO15420
Full Name	Nick Hanling
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <ul style="list-style-type: none"> But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO15468
Full Name	Sarah and Nigel Tester
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 & Options' consultation and I have attached their reponse which I request you accept this as confirmation that I wish DBC to duplicate</p>

	<p>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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO15524
Full Name	Miss Tanya Assarat
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO15573
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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO15640
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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO15699
Full Name	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>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.</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO15747
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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within</p>

	<p>the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO15794
Full Name	David Kerrigan
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 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO15862
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

Your response - Please add your response here	<ul style="list-style-type: none"> The only observation DBLP wishes to make on the “rural area” is the need to ensure that there is no sequential preference to development in the “rural area” when compared to green belt locations
Include files	
Number	Question 10
ID	LPIO15923
Full Name	James Pitt
Company / Organisation	Gleeson Developments Limited
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 Local Plan should continue to apply policies for restraint in the rural areas of the district outside of the Green Belt. The rural area beyond the Green Belt contains those part of the district of highest landscape and environmental value, and also tends to accommodate the smallest and least sustainable pattern of existing settlements.
Include files	
Number	Question 10
ID	LPIO16052
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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “rural area” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p>

	Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.
Include files	
Number	Question 10
ID	LPIO16106
Full Name	Helen and Aaron Talbot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO16165
Full Name	Stuart Mcgrory
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 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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO16221
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>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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within</p>

	<p>the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO16283
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>please find the attached report written on mine and other residents request.</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO16345

Full Name	Aaron Smith
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 support GFRA responses see below.</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO16392
Full Name	Ruth and Stephen Wright
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 & 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>..</p>

	<p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO16458
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>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO16534
Full Name	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>Question 10 Do you agree with the proposed approach to the Rural Area summarised above?</p> <p>Yes</p> <p>. But must retain and strengthen existing policies in respect of the AONB</p>
Include files	
Number	Question 10
ID	LPIO16676
Full Name	Katie Parsons
Company / Organisation	Historic England
Position	Historic Environment Planning Advisor
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The consultation documents states that 85% of the Borough is rural in nature. The historic environment is an important part of the Borough's rural hinterland. There are many heritage assets within the rural parts of the Borough, and policies should ensure their conservation and enhancement.</p>
Include files	
Number	Question 10
ID	LPIO16817
Full Name	Jon G. Wright Dawn Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the "rural area" should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the</p>

	<p>non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO16885
Full Name	Jan Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO16973
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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO17030
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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB),</p>

	<p>not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO17087
Full Name	Grahame Senior
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 support and endorse the views expressed in the attached document as a member of GFRA</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO17130
Full Name	D. Phillips
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 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 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO17219
Full Name	Debbie Crooks Pam Moss
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	

Number	Question 10
ID	LPIO17277
Full Name	Margaret and Andrew Pike
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 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO17334
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>...</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less</p>

	<p>harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO17386
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 10 below (copy of full response attached to question 46)</p> <p><i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes, but the Chilterns AONB needs specific policy protection.</p>
Include files	
Number	Question 10
ID	LPIO17441
Full Name	Sara Bell
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 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>GFRA Response to Question 10, full document attached to question 46</p>

	<p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO17500
Full Name	Emma Talbot
Company / Organisation	The Little Cloth Rabbit
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a report (GFRA) about the proposed development of Tring.</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p> <p>...</p>
Include files	

Number	Question 10
ID	LPIO17548
Full Name	MR DAVID 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 10 below (copy of full response attached to question 46)</p> <p><i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes, but the Chilterns AONB needs specific policy protection.</p>
Include files	
Number	Question 10
ID	LPIO17607
Full Name	Paul Hembury
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 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 & Development details my concerns comprehensively.</p> <p>...</p> <p>Q10 – Tick NO</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits</p>

	<p>within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO17681
Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>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.</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO17730
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 10 below - full document attached to Question 46</p> <p><i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes, but the Chilterns AONB needs specific policy protection.</p>
Include files	
Number	Question 10
ID	LPIO17786
Full Name	John and Helen Osborne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “rural area” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>

Include files	
Number	Question 10
ID	LPIO17844
Full Name	David and Jane Elsmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO17902
Full Name	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>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plans for additional building in the Tring area.</p> <p>GFRA Response to Question 10, full document attached to question 46</p>

	<p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO17962
Full Name	Mr Michael Burbidge
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 10
ID	LPIO18011
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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO18082
Full Name	Mr Graham Bright
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 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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy</p>

	of potential harm that can be applied to the relevant land parcels.
Include files	
Number	Question 10
ID	LPIO18139
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO18196
Full Name	Nicky and Dave Hulse
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please see attached the Grove Fields Residents Association's responses to the proposed developments

	<p>in Tring, which we concur with and of which we are a member</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO18249
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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO18309

Full Name	Terry and Jennifer Elliott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO18455
Full Name	Mrs Wendy Mclean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>There is not so much of the Chilterns in Dacorum! Some of the land in Wilstone/Long Marston may fall within the Chiltern ONB but the land isn't designated as Green Belt. There appears to be unwillingness to consider area's that lack infrastructure. There has to be an argument for some proportional development here. Not</p>

	just to provide homes but to provide the existing communities with better services and facilities. They are desperately forgotten. Some Councillors and Council workers do not even know this area is in the Borough.
Include files	
Number	Question 10
ID	LPIO18477
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>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO18523
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>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.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO18570
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>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO18616
Full Name	Lindy Weinreb
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>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes, but the Chilterns AONB needs specific policy protection.</p>
Include files	
Number	Question 10
ID	LPIO18663
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>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>

	<p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO18709
Full Name	Paul and Gillian Jenkins
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 & 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, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>...</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO18755
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	<i>Do you agree with the proposed approach to the Rural Area summarised above?</i> Yes, but the Chilterns AONB needs specific policy protection.
Include files	
Number	Question 10
ID	LPIO18802
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>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> <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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO18851
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>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>

	<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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO18897
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	<p>I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>...</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO18940
Full Name	Rupert Symmons
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We do feel that some development within the rural areas should be considered which expands slightly on existing settlements.
Include files	

Number	Question 10
ID	LPIO18975
Full Name	Mrs Emma Robertson
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 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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO19038
Full Name	Barbara Gainsley
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 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>Yes, but the Chilterns AONB needs specific policy protection.</p>
Include files	
Number	Question 10
ID	LPIO19095
Full Name	Bill Ahearn
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 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</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO19153
Full Name	Ms Sarah Hain
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 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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO19211
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association
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 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>GFRA Response to Question 10, full document attached to question 46</p>

	<p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO19268
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits</p>

	<p>within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO19322
Full Name	Stuart, Miranda & Melissa Kay
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO19369
Full Name	Wai Tang and Greg Barfoot
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 note we are aware that 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, 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO19418
Full Name	Philippa Jones
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 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>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes, but the Chilterns AONB needs specific policy protection.</p>
Include files	
Number	Question 10
ID	LPIO19473
Full Name	John Wignall
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>I would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 10</p>
<p>ID</p>	<p>LPIO19530</p>
<p>Full Name</p>	<p>Kevin Cullen</p>
<p>Company / Organisation</p>	
<p>Position</p>	
<p>Agent Name</p>	
<p>Company / Organisation</p>	
<p>Position</p>	
<p>Your Opinion - Please state your opinion here</p>	<p>No</p>
<p>Your response - Please add your response here</p>	<p>Please refer to the attached report.(BRAG)</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as</p>

	those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.
Include files	
Number	Question 10
ID	LPIO19588
Full Name	Mark Lawson and Sharon Wilkie
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 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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO19644
Full Name	Vivienne 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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO19685
Full Name	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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and</p>

	<p>review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO19757
Full Name	Ben Barth
Company / Organisation	
Position	
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 proposed local plan are set out on the attached document which I fully endorse (full document on q 46)</p> <p>Question 10</p> <p><i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes, but the Chilterns AONB needs specific policy protection.</p>
Include files	
Number	Question 10
ID	LPIO19826
Full Name	Jon Esson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I am a member of the Grove Fields Residents Association and support the findings set out in their report as attached

	<p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LP1019910
Full Name	Chris Smith
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 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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy</p>

	of potential harm that can be applied to the relevant land parcels.
Include files	
Number	Question 10
ID	LPIO19967
Full Name	mrs sue van rhee
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 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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO20024
Full Name	Kate and Ben Marston
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO20081
Full Name	Maurice and Christine O'Keefe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 10, full document attached to question 46</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the</p>

	<p>Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO20138
Full Name	Sherry and Haydn Bond
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 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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>

Include files	
Number	Question 10
ID	LPIO20196
Full Name	Dianne Pilkington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10

ID	LPIO20244
Full Name	Mr Peter 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>I have seen the submission to DBC by the Berkhamsted Residents Action Group (BRAG), the contents of which I support.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO20299
Full Name	David Clarke
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 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>GFRA Response to Question 10, full document attached to question 46</p>

	<p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LP1020357
Full Name	Deborah Turnbull
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 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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>

Include files	
Number	Question 10
ID	LPIO20405
Full Name	Jane Collis
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 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO20466
Full Name	Mr David Parker
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 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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the</p>

	<p>Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO20514
Full Name	DR Brigitta Case
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 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 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.</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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB <p>Berkhamsted Citizens response</p>

	<p><i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes, but the Chilterns AONB needs specific policy protection</p>
Include files	
Number	Question 10
ID	LPIO20561
Full Name	Christine Manning
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 support the views put forward by the Berkhamsted Citizens Association in their response to the Core Strategy</p> <p><i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes, but the Chilterns AONB needs specific policy protection.</p>
Include files	
Number	Question 10
ID	LPIO20633
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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand</p>

	<p>whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LP1020689
Full Name	Keiron Wybrow
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 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>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LP1020737
Full Name	Christopher Townsend

Company / Organisation	
Position	Councillor, Tring Town Council
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	As a member of Tring Town Council I agree with all the responses that have been submitted by Tring Town Council (copy below) The proposed approach should not preclude consideration of a new 'village' option to meet the housing need, particularly if the level of housing imposed upon the Borough be such that it cannot realistically be met within the existing settlement hierarchy.
Include files	
Number	Question 10
ID	LPIO20785
Full Name	Usha Kilich
Company / Organisation	Northchurch Parish Council
Position	Parish Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes, but the Chilterns AONB needs specific policy protection.
Include files	
Number	Question 10
ID	LPIO20831
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	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. BRAG response to Question 10 (please note full document is attached to Q46) Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i>

	<p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO20907
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	<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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO20962
Full Name	Mr & Mrs J.D Battye
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<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</p>

	<p>endorsement of Berkhamsted Town Council's submission.</p> <p>Q10.BRAG</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB <p>Berkhamsted Town Council response</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p>
Include files	
Number	Question 10
ID	LPIO21047
Full Name	julie owen
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 attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO21112

Full Name	Sheron Wilkie
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 attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p>GFRA Response to Question 10, full document attached to question 46</p> <p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO21188
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>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <p>But must retain and strengthen existing policies in respect of the AONB</p>
Include files	
Number	Question 10

ID	LPIO21240
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>As a nationally protected landscape, with equal planning status to National Parks, great weight should be given to conserving landscape and scenic beauty of Areas of Outstanding Natural Beauty (set out in the Government's National Planning Policy Framework para 115). The plan should have a section and policy/policies specifically on the Chilterns AONB, distinct from the wider Rural Area. The future of the AONB is a pressing issue of its own, which should be higher profile than the Green Belt or undesignated countryside. Applying the same policy approach to Green Belt/AONB/ wider countryside does not reflect the different purposes (and in the case of AONB, statutory duty) and the different NPPF policies for these areas.</p>
Include files	
Number	Question 10
ID	LPIO21311
Full Name	Antony Harbidge
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 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p>

	<ul style="list-style-type: none"> But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO21357
Full Name	Helen Kington
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 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO21516
Full Name	Mr Chris Briggs
Company / Organisation	St Albans City & District Council
Position	Spatial Planning Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Q.10 Rural Area – No</p> <p>8. <u>Rural areas (beyond Green Belt)</u></p> <p>The analysis at Para 5.3 is considered flawed. It is contrary to the NPPF to treat the rural areas of the District “in broadly the same way as those within the Green Belt”. This is particularly the case at a time when there is substantial growth pressure.</p> <p>SADC has made clear at DtC meetings on several occasions that full and positive consideration by DBC of this area for potential growth is required. This is in order</p>

	to comply with the NPPF in terms of prioritising non-MGB land and to meet the DtC. This non-MGB rural area should be treated, in principle, as a preferred area of search for growth locations (given its non-MGB status), including new or expanded settlements.
Include files	
Number	Question 10
ID	LPIO21537
Full Name	Mrs Valerie Silverton
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 proposals and strongly agree BRAG's responses.</p> <p>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO21594
Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>GFRA Response to Question 10, full document attached to question 46</p>

	<p>Our opinion is that the land defined as the “<i>rural area</i>” should undertake the same level of scrutiny and review as that which has been undertaken in relation to the Green Belt review thus far in the preparation of the plan. Whilst it is noted that some of the rural area sits within the Chiltern Area of Outstanding Natural Beauty (AONB), not all of it sits within this designation. The quality of the non-Green Belt designated land within the countryside needs to be reviewed independently upon its own merits within its locality within the Borough to understand whether it can contribute to development that offers less harm to its surroundings than designated Green Belt land.</p> <p>Therefore whilst the Local Authority proposed to assess the sites in the rural areas in broadly the same way as those in the Green Belt, it is essential therefore that this land is fully assessed so as to provide a clear hierarchy of potential harm that can be applied to the relevant land parcels.</p>
Include files	
Number	Question 10
ID	LPIO21666
Full Name	Mr John Monk
Company / Organisation	
Position	
Agent Name	Mr Nick Shute
Company / Organisation	Nick Shute Associates
Position	Planning and regeneration consultancy
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><u>Response:</u></p> <p>The ‘Rural Area’ is the countryside that isn’t designated as Green Belt. However, in the past, the Council has treated the Rural Area in a similar way to the Green Belt when considering development potential.</p> <p>We do not think this approach is correct. The Green Belt has a very special set of defined purposes, which are very different from the rural area beyond the Green Belt. This distinction should be recognised in the Local Plan and the two should not be treated in the same way.</p>
Include files	
Number	Question 10
ID	LPIO21877
Full Name	Louis Quail
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 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"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO21918
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 & 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>BRAG response to Question 10 (please note full document is attached to Q46)</p> <p>Question 10 <i>Do you agree with the proposed approach to the Rural Area summarised above?</i></p> <p>Yes</p> <p>But must retain and strengthen existing policies in respect of the AONB</p>
Include files	
Number	Question 10
ID	LPIO21945

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: Yes, but the Chilterns AONB needs specific policy protection.</p>
Include files	
Number	Question 10
ID	LPIO22025
Full Name	Gallagher Estates
Company / Organisation	Gallagher Estates
Position	
Agent Name	Mrs Hanna Staton
Company / Organisation	Pegasus Group
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ul style="list-style-type: none"> • In light of the likely significant uplift to the dwelling requirement in the Borough to meet the need of market and affordable homes and that there is limited urban capacity to meet the housing needs, it is appropriate to consider land from both the Green Belt and the Rural Area. It is important that every source of development sites should be considered, subject to maintaining sustainability principles. Indeed, it should be recognised that new development can enhance the sustainability of a location if it is planned holistically. • Whilst it is understood that the Council is keen to protect the character of the Rural Area, it is important to draw a distinction between the policy constraints applicable across the Borough. Clearly, the Green Belt is an artificial policy constraint unlike and AONB. Whilst the Government has sought to elevate Green Belt importance, often this land is in very sustainable and accessible locations and can provide a solution to meeting housing needs. The Rural Area, whilst it can be without constraints, by its nature it is less accessible and sustainable, however, some level of development will be necessary to ensure the needs of communities are met. It is important that these factors are appropriately weighed up when

	determining the distribution of dwellings in Dacorum.
Include files	
Number	Question 10
ID	LPIO22075
Full Name	Kings Langely & District Residents Association
Company / Organisation	Kings Langley and District Residents association
Position	
Agent Name	Jane Terry
Company / Organisation	Vail Williams
Position	Partner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Protection of the countryside is important, and it would be supported by KL&DRA to have limited development in rural areas as stated in Option 1A.</p> <p>A settlement should be considered in a rural area if the settlement is surrounded by open countryside. This is the case for Kings Langley. Although Kings Langley is classed as a large village, the settlement hierarchy focuses on size rather than character. Kings Langley is surrounded by open countryside and this is part of the village's character. Limiting development would protect the countryside and King Langley's character. The current proposals are situated on the periphery of Kings Langley and are set in the open countryside. The approach should be reviewed to remove greenfield sites in preference for brownfield development in and around Kings Langley.</p> <p><u>Gallagher Homes Ltd v Solihull DC [2014] EWCA Civ 1610</u></p> <p><i>'The fact that a particular site within a council's area happens not to be suitable for housing development cannot be said without more to constitute an exceptional circumstance, justifying an alteration of the Green Belt by the allocation to it of the site in question.'</i></p> <p><u>IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J</u></p> <p><i>'What is clear from the principles distilled in the case of Gallagher is that for revisions to the Green Belt to be made exceptional circumstances have to be demonstrated. Whether they have been, is a matter of planning judgment in a local plan exercise ultimately for the inspector.'</i></p> <p>In consideration of the case law above the approach has failed to show that exceptional circumstances have been demonstrated. Therefore, there can be no justification for revising the Green Belt around Kings Langley. The Council should review alternative options for development that would not impact on the Green Belt around Kings Langley. Before considering allocating or releasing sites within the Green Belt the Council should explore:</p>

	<ul style="list-style-type: none"> • making effective use of suitable brownfield sites and the opportunities offered by estate regeneration; • the potential offered by land which is currently underused, including surplus brownfield public sector land where appropriate; • optimising the proposed density of development; and • exploring whether other authorities can help to meet some of the identified development requirement. • KL&DRA support minimum development within rural areas. For this reason, KL&DRA supports Option 1A <p><u>QUESTION 10 Approach to Rural Areas - Summary Representation and Response Sought:</u></p> <p>The Council should review alternative options for development that would not impact on the Green Belt around Kings Langley. Before considering allocating or releasing sites within the Green Belt the Council should explore the following:</p> <ul style="list-style-type: none"> • Making effective use of suitable brownfield sites and the opportunities offered by estate regeneration; • The potential offered by land which is currently underused, including surplus public-sector land where appropriate; • Optimising the proposed density of development; and • Exploring whether other authorities can help to meet some of the identified development requirement. • KL&DRA support minimum development within rural areas. For this reason, KL&DRA supports Option 1 A
Include files	
Number	Question 10
ID	LPIO22126
Full Name	Mrs Hayley 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 10
ID	LPIO22170
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 10
ID	LPIO22214
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 10
ID	LPIO22491
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	Please find below our response to the new Local Plan consultation. I fully support Brag's response on this matter (see below) <ul style="list-style-type: none"> • But must retain and strengthen existing policies in respect of the AONB
Include files	
Number	Question 10
ID	LPIO22541
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	I support all answers and comments to the Issues & Options Consultation document noted on the Berkhamsted Town Council website Yes, but the Chilterns AONB needs specific policy protection
Include files	
Number	Question 10
ID	LPIO22611
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	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:
Include files	
Number	Question 10
ID	LPIO22687
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Question 10 – Do you agree with the proposed approach to the Rural Area summarised above?

	<p>Yes. Due to the limited extent of 'Rural Area' that lies outside the Green Belt or the Area of Outstanding Natural Beauty (and its setting).</p> <p>In general, these areas do not have the same levels of services, facilities and infrastructure and therefore consideration of whether a development in a particular area could be made sustainable should be considered in the same way as with Green Belt</p>
Include files	
Number	Question 10
ID	LPIO22798
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As these has been no adequate demonstration that these are exceptional circumstances. Under the case law above there can be no justification to make any revision to the green belt around Kings Langley</p> <p>The law states that if there are environmental and green belt issues then lower numbers can be found to be sound</p>
Include files	

Report Settings Summary

Event	Local Plan Issues & Options November 2017
Total Responses	22,707
Total Respondents	2,376
Filtered Responses	594
Filtered Respondents	515
Questions	<p>Question 11</p> <p>Do you agree with the proposed approach to selecting sites?</p> <p>Yes / No</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)	ID-4764248-QUESTION-11
Pivot	<i>(none)</i>
Document Name	Question 11 - Summary Report
Created on	2019-04-17 07:48:27
Created by	Strategic Planning Admin

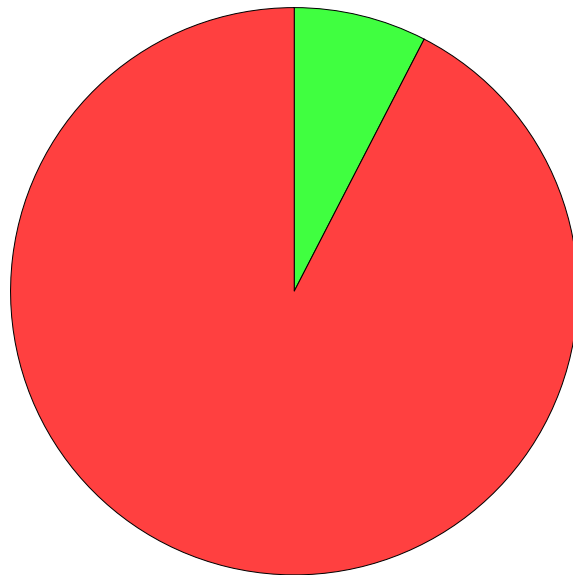
Your Opinion

Question responses: **594 (100.00%)**

Question 11

Do you agree with the proposed approach to selecting sites?

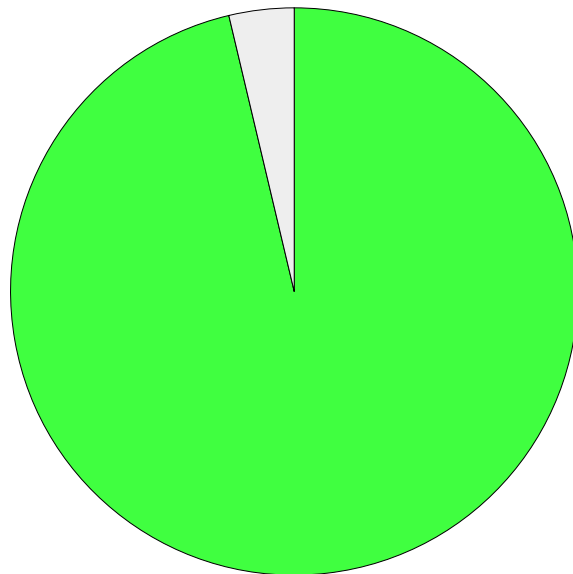
Yes / No



	% Total	% Answer	Count
Yes	7.58%	7.58%	45
No	92.42%	92.42%	549
Total	100.00%	100.00%	594

Responses

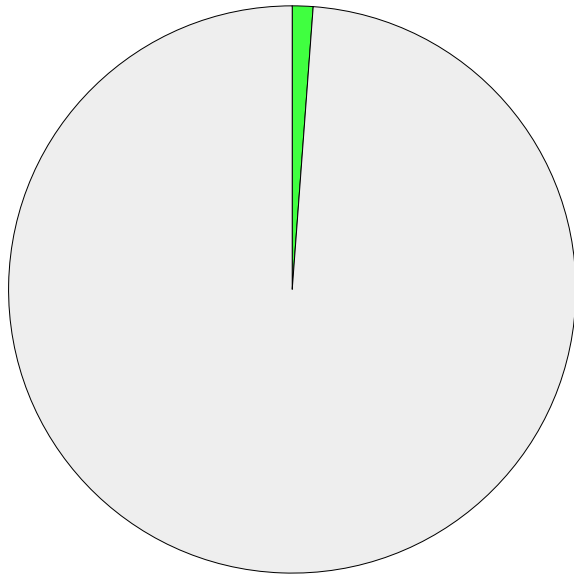
Question responses: **572 (96.30%)**



	% Total	% Answer	Count
■ Responses	96.30%	100.00%	572
■ No Response	3.70%	--	22
Total	100.00%	100.00%	594

Supporting evidence

Question responses: 7 (1.18%)



	% Total	% Answer	Count
■ Response with File(s) Uploaded	1.18%	100.00%	7
■ No Uploads	98.82%	--	587
Total	100.00%	100.00%	594

Issues and Options All Responses to Question 11

Number	Question 11
ID	LPIO15
Full Name	Mrs Jennifer Ponsford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I think the threshold for considering sites should be higher. Larger sites offer the opportunity to provide new community infrastructure - you can negotiate with the developer to supply schooling, community facilities and new public transport. Whilst smaller sites of 10+ may offer some income as a result of CIL this is not adequate to anywhere meet the impact potential increase in housing will have on communities. There is a risk that you could end up with a 'pepper pot' pattern of new housing which cumulatively would have a significant impact upon towns and villages, the results of which you can't accurately predict or compensate for. Larger sites offer the opportunity for greater levels of strategic planning and infrastructure provision.
Include files	
Number	Question 11
ID	LPIO34
Full Name	rosie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Lucas site is in need of development, not sure about housing though due to its proximity to Buncefield, however, a full Medical Centre/Hospital would be a good choice. Close to M1. As you have already given permission to other social association housing.
Include files	
Number	Question 11
ID	LPIO80
Full Name	Mr John Lilley
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 11
ID	LPIO150
Full Name	Mrs Rebecca Sterling
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Greenbelt sites should be protected at all costs because their importance is outlined in national planning policy.</p> <p>The national planning policy framework states that the green belt should serve the following purposes. 4 of these 5 are relevant to the proposal so state these as Dacorum must follow these points.</p> <ul style="list-style-type: none"> - check restricted sprawl of large built up areas. So we need to keep kings Langley as a village separate from Hemel/apsley. - prevent neighbouring towns merging into one another - assist in safeguarding countryside from encroachment. Three farms clearly constitute encroachment on countryside - preserve setting and special character of historic towns. Clearly kings Langley special village with medieval history which would be lost if becomes amalgamation of Hemel and Watford <p>Therefore only brownfield sites should be developed And ideally focus these around towns rather than small villages like kings Langley.</p>
Include files	
Number	Question 11
ID	LPIO165
Full Name	Mr John Shaw
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Green belt land should be protected at all costs. The proposal to develop Wayside farm, a working farm on green belt land on the outskirts of Kings Langley just because it is surrounded by the A41 and the M25 goes</p>

	against all these smooth words in the previous three sections. The green belt is to prevent urban sprawl and the merger of settlements and therefore there must be no development on the four areas around Kings Langley. Only brown field sites should be used and their use should be restricted to around urban areas.
Include files	
Number	Question 11
ID	LPIO261
Full Name	Ms Cheryl Hall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As stated elsewhere, once you build on the countryside, it cannot be reinstated. Dacorum, please protect the rural way of life enjoyed in Kings Langley. Do not build on greenbelt.
Include files	
Number	Question 11
ID	LPIO273
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Once you destroy the Green Belt status and build on the land, it cannot ever be reinstated or replaced. This would be a travesty for Kings Langley if these developments were to go ahead and our precious greenfield surroundings be destroyed forever.
Include files	
Number	Question 11
ID	LPIO291
Full Name	Ms Jane Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I do not agree that green belt or rural land should be in any part of the overall plan
Include files	
Number	Question 11
ID	LPIO326
Full Name	Mr David Stanier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The proposed approach has good objectives ... but it is not convincing that all brownfield site possibilities have been explored.
Include files	
Number	Question 11
ID	LPIO381
Full Name	Mr Michael Bouvier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The coalescence of settlements, which is contrary to Local Plan Policy, will result in a loss of community identity. Kings Langley has a proud history, distinct identity and rural setting which manifests itself in social cohesion and self-reliance. Any erosion of this identity will result in a breakdown of these delicate social structures and compromise villagers' quality of life.
Include files	
Number	Question 11
ID	LPIO449
Full Name	Ms Julia Marshall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Greenfield sites are also a finite resource, once lost they cannot be reinstated. As previously stated, small piecemeal developments will not merit improvements to infrastructure, but taken as a whole will increase the strain on resources exponentially. Aside from the small scale natural development that takes place in towns and villages (not included in the plan), Dacorum should be focussing on identifying and obtaining larger brownfield sites where infrastructure can be created from scratch and sustainability ensured.
Include files	
Number	Question 11
ID	LPIO541
Full Name	Mrs Sarah West
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 11
ID	LPIO566
Full Name	Mrs Caroline Williams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt should remain greenbelt.
Include files	
Number	Question 11
ID	LPIO620
Full Name	Mrs Carole Stokes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Roads and bus services are at breaking point. I travel to and from Watford for work, it takes on average 45minutes to 1 hour to travel approximately 8 miles, and on many occasions in excess of 2 hours. Family members frequently spend 2 hours traveling by bus on the same journey. Our infrastructure cannot cope.
Include files	
Number	Question 11
ID	LPIO663
Full Name	Mr David Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Prioritise brown field sites and where chosen develop green belt sites in a holistic fashion with supporting infrastructure.
Include files	
Number	Question 11
ID	LPIO747
Full Name	Mrs Victoria Vernon
Company / Organisation	Sport England
Position	Trainee Planer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Sport England seeks to ensure that care is taken not to include any playing field sites within this allocation.
Include files	
Number	Question 11
ID	LPIO769
Full Name	Mr David Palfrey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Transport infrastructure and linked assessments should be completed before proposed areas for development

	are published and should be available for public comment as part of this process not later once areas are finalised. It's clear the Kings Langley proposals will have a serious impact to what is already a challenging congestion issue inand around th high street on on local roads for parking.
Include files	
Number	Question 11
ID	LPIO775
Full Name	Mr Hemant Patel
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 11
ID	LPIO804
Full Name	Mr Austen Constable
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The green belt should remain undeveloped. The rural setting should be preserved, it's part of our heritage and once developed it's irreversible.
Include files	
Number	Question 11
ID	LPIO819
Full Name	Mrs Karen Bevan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Avoid building on Green Belt land, utilise Brownfield sites first. Allow higher density housing where appropriate, eg Hemel which is currently behind other areas in building homes.

Include files	
Number	Question 11
ID	LPIO859
Full Name	Mr Stephen Bevan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	No building on green belt should be allowed until ALL brownfield sites have been used in Berkhamsted first. Also allow higher density housing where appropriate in Hemel Hempstead until Hemel has caught up with other areas in terms of housing development.
Include files	
Number	Question 11
ID	LPIO882
Full Name	Mr Ian Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	More change of use should be allowed ie shops and offices to residential as in Maylands Avenue Hemel Hempstead and there must be priority given to brown field sites.
Include files	
Number	Question 11
ID	LPIO922
Full Name	Ms Stephanie Knowles
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt sites should be completely protected - once its gone, it's gone, along with the wildlife, flora and fauna.
Include files	
Number	Question 11

ID	LPIO957
Full Name	Mr Robin Knowles
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No, they should be examining building a new town instead of overloading existing villages
Include files	
Number	Question 11
ID	LPIO1031
Full Name	mr Tish Seabourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure would apply (indeed to a greater amount) to substantial sites being promoted in the Market Towns of Berkhamsted and Tring. • Strongly support development of brownfield sites before Green Belt sites are considered, however this objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).</p> <p>• 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>Brownfield sites must take priority. Higher density development should be allowed in Hemel Hempstead. Why not create a whole new town with suitable infrastructure and facilities and not strain existing services beyond their capacity.</p>
Include files	
Number	Question 11
ID	LPIO1079
Full Name	Ms Tish Seabourne
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>All brownfield sites should be developed before even considering greenfield sites, especially the existing Green Belt sites. There is an implication that Green Belt sites are easier to develop quickly (and presumably are more profitable for developers) but this does not well with a long term plan. It is totally illogical to exclude sites with potential for 3000 plus units because development would take longer - this is supposed to be a long term plan. Of course larger sites would require infrastructure but so would a large number of smaller sites.</p> <p>Some issues have not been addressed at all or adequately such as higher density developments and the possibility of higher buildings in Hemel which would reduce pressure in other parts of Dacorum.</p>
Include files	
Number	Question 11
ID	LPIO1082
Full Name	Mr Dominic Gibberd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Focus on the redevelopment of existing stock, not the destruction of our land. Large housebuilders want big open spaces to throw up identical houses before moving on to their next windfall. This leaves a blanket of unattractive buildings on once beautiful countryside. Engage with skilled design to make better use of what we already have.</p> <p>Stop being lazy.</p>
Include files	
Number	Question 11
ID	LPIO1128
Full Name	Mrs Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	The AONB should have the highest level of protection
Include files	
Number	Question 11
ID	LPIO1144
Full Name	Mrs Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Priority should be to brown field sites first. Higher density could be allowed in Hemel provided it is done with care. Even a truly well-planned new Garden Town could be considered but only if done well.
Include files	
Number	Question 11
ID	LPIO1178
Full Name	Mr John Ingleby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Every major project should normally provides some consideration of the relative costs involved in different options. Such considerations would include:</p> <ul style="list-style-type: none"> * Costs of additional infrastructure for improved transport links, water and energy supplies, drainage, energy supplies, education and health services, and new business facilities * Social losses / gains, such as community cohesion, ease of access to shops, services and amenities, and access to open landscapes <p>However, the approach in this Consultation seems to be “first decide where homes are to be built, and then we will work with infrastructure providers to make sure needed improvements are put in place”.</p> <p>This approach overlooks the facts that improvements are already urgently needed in many infrastructure areas, for example the transport infrastructure where existing peak</p>

	hour congestion will be made worse by new building, with consequent lower quality of life for all residents in the Borough.
Include files	
Number	Question 11
ID	LPIO1203
Full Name	Mr Bernard Richardson
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 Council should not be considering anything other than Brownfield sites in the first instance. This piecemeal - plot by plot approach will not make the most of the finite space available.</p> <p>Has the question been asked - is this actually where people will want to live and is it the best place for them~?</p> <p>The council should be considering more high rise developments in the main town in the Borough rather than spreading homes at ground level.</p>
Include files	
Number	Question 11
ID	LPIO1262
Full Name	Sarah Harper
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 Council should protect the Greenbelt and consider all urban and Brownfield sites before considering anything that impacts on the Green Belt. There should be a long term policy to protect the Green Belt from any form of mass development.</p>
Include files	
Number	Question 11
ID	LPIO1355
Full Name	Mr Andrew Calderwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Two reasons: (1) The approach to selecting sites encourages promoters to put forward sites having done little preparatory work themselves. This then leaves (a) DBC (i.e. payers of Council Tax) to bear the cost of evaluating sites which do not meet the objectives or policies set out in the Core Strategy and (b) residents and Town Councils to spend countless hours and not insignificant sums in examining and giving feedback to DBC on such sites. Promoters should have to pay an upfront fee before DBC spends money examining the proposal so as to discourage speculative proposals. (2) Sites are proposed not to meet assessed need but because promoters wish to maximise their own profits.
Include files	
Number	Question 11
ID	LPIO1426
Full Name	Ms G Puddiphatt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenfield sites should be taken out of the Local Plan.
Include files	
Number	Question 11
ID	LPIO1434
Full Name	Mr Brian Rook
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Policy should be to build only on Brownfield, greenfield and possibly some Safeguarded sites. No development should be implemented on Greenbelt land.
Include files	
Number	Question 11
ID	LPIO1494
Full Name	Mr Chris Marks
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Building and expanding existing towns with all the infrastructure in place should be the first port of call. villages should not be expanded.
Include files	
Number	Question 11
ID	LPIO1543
Full Name	MR PETER SUMMERFIELD
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 building in Bovingdon for reasons previously stated. Brownfield sites should definitely be targeted first, for example, Bovingdon Airfield should be considered for a one-off large development. There is plenty of available space even allowing for the commercial activity to continue.</p> <p>More focus should be made on the timespans suggested. For the Green Lane/Homefield site (Bov-h2), in particular, it is totally unacceptable for the construction to be done over a period of 3+ years in batches of 50 houses per year. This is purely for the benefit of the developer who wishes to raise sufficient funds from the building of the first phase, to build the next etc. The construction process will heavily impact on the lives and health of the residents living in Homefield, in particular, a <u>very short</u> cul-de-sac, who would have to put up with the noise and pollution from the continuous construction traffic going past their front doors each and every day for 3 years. It will also have a detrimental effect on the residents living in Yew Tree Drive and Austins Mead whose houses back directly on to the proposed site.</p> <p>An alternative access road should be found if this development is to proceed (not Louise Walk!)</p>
Include files	
Number	Question 11
ID	LPIO1544
Full Name	MR PETER SUMMERFIELD
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No greenbelt sites should be developed. I disagree with the "safeguarding" of any sites for future development. This 'blights' the properties in the surrounding area and may make them difficult for future sale. Take for instance, the proposed 'Tesco Express' site in Bovingdon. Tesco mothballed the site for at least 6 years leaving it derelict and although the land has now been purchased by a developer for flats and a small Tesco shop it is only in the last year that hoardings have gone around the site - but still no sign of any building work taking place. This is 'land banking' at its worst.
Include files	
Number	Question 11
ID	LPIO1604
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	Although it is illogical to exclude large sites where delivery could be piecemeal but overall plan-led.
Include files	
Number	Question 11
ID	LPIO1665
Full Name	Jenny Thorburn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Too quick to go for greenbelt sites - need to prove no alternatives first.
Include files	
Number	Question 11
ID	LPIO1737
Full Name	Mr Kenneth Watts
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 11
ID	LPIO1764
Full Name	Mr Craig Wiggill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1. I see inadequate protection for greenbelt within the concept of greenfield</p> <p>2. I do not believe that the approach suggested gives sufficient interrogation to the carrying capacity argument against overdevelopment.</p>
Include files	
Number	Question 11
ID	LPIO1783
Full Name	Mrs Pamela Kingsland
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	All possible consideration should be to protect all greenbelt development for future generations. With ever increasing the population of England how on earth we will be able to sustain the food production if we concrete over greenbelt, for once its gone itwill lost forever.
Include files	
Number	Question 11
ID	LPIO1821
Full Name	Mr Richard Case
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"> • I think it is wrong to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, such as Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. • I strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. Certainly three storey buildings should be encouraged where appropriate with the character of the surrounding development. • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. • Gardens are "Greenfield" sites and development should be discouraged as indicated in the Government White paper.
Include files	
Number	Question 11
ID	LPIO1847
Full Name	Mr Lawrence Sutton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Using any existing brownfield sites first must have the highest priority. No Green Belt should be considered without looking properly at all brownfield options.

Include files	
Number	Question 11
ID	LPIO1857
Full Name	Mr Peter 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>It is disingenuous to claim that very large scale developments will place any more pressure on local infrastructure than a series of smaller sites. New, large sites with new infrastructure will be easier to provide than taking a piecemeal approach and will also offer economies of scale. For instance, a new large site would justify the building of a new, dedicated school whereas it would not be practical for a series of smaller sites.</p> <p>Why should larger sites take any more time to get started than a series of smaller sites? Having a large amount of plant available on one site makes more sense than having small pools of plant spread over a wide area.</p> <p>The claim that 'Greenfield sites are undeveloped sites in both the urban areas and in the countryside' is very dangerous. Greenfield sites are specifically identified sites , protected by current planning law.</p>
Include files	
Number	Question 11
ID	LPIO1918
Full Name	Miss teresa finnigan
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 Council should protect the Greenbelt and make use of the many brownfield sites. Protect and preserve the GB, its in place for a number of reasons and should remain so.</p>
Include files	
Number	Question 11
ID	LPIO2016
Full Name	Mrs Christine Mabley
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Changes of green belt status to greenfield or development green belt land should be clarified here not by cross-reference. It seems anomalous to me that Bovingdon Airfield has green belt status.
Include files	
Number	Question 11
ID	LPIO2039
Full Name	Mrs Jane Hennell
Company / Organisation	Canal & River Trust
Position	Area Planner
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The Trust is concerned over the evidence base which is being used to support the development of the new local plan.</p> <p>The <i>'Schedule of Site Appraisals Sustainability Appraisal Working Note document'</i> is intended to assess strategic sites which may be available in order to assist in meeting housing needs for the area over the plan period. The assessment uses either a threshold of 50 units or those sites in mixed use are to be included, however it is not clear how such sites have themselves been selected.</p> <p>There is an anomalous site within the list, located at Wilstone. There are no definitive mix of uses for the site which is suggested would have up to 42 units (below the threshold) and for which no commitment to other uses is confirmed.</p> <p>It is evident that this site does not therefore meet the criteria for inclusion within this assessment process as set out by the Council.</p> <p>It is noted that the Council is also undertaking a call for sites which will no doubt also use details already available from previous exercises of this nature. It is essential that the Council assesses potential development sites in a fair and equal manner in order to deliver a robust local plan. The Trust is concerned that taking a single rural site represents a potentially unfair means of assessment and sets the site at Wilstone in a different context to other sites around that village. There has been no examination as to whether any objectives could be met from alternative sites. The site assessed is clearly not a strategic or brownfield parcel of land which the study seeks to focus on but rather a greenfield site on the edge of a village and similar therefore in principle to many others. It should be assessed as such.</p>

	The evidence which seeks to support the plan is in the Trust's view flawed and gives rise to an unfair two tier process for the identification of rural sites for development. Such an approach is not sound and it is essential that moving forward rural sites on the edge of villages are assessed in an equitable and transparent manner.
Include files	
Number	Question 11
ID	LPIO2050
Full Name	Mr Christopher Giddings
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 11
ID	LPIO2161
Full Name	Mr Les Mosco
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>It is damaging and unnecessarily restrictive to exclude large sites such as East Hemel or RAF Halton. Large sites offer the only opportunity to provide the necessary additional infrastructure given the predominant valley bottom topography, most especially affecting Tring and Berkhamsted.</p> <p>Clearly development of brownfield sites before Green Belt sites is essential, but these too should only proceed where the supporting infrastructure can be developed. This has not been the case with for example, the many infill sites in Berkhamsted, which have packed in higher density flats, but have made roads infrastructure worse, (eg the badly laid out or poorly sequenced traffic lights at Stag Lane and Durrants Lane). The use of brownfield sites is consistently contradicted by giving emphasis to Green Belt sites that can deliver early. But for all sites, Green Belt and brownfield, the cumulative impact of small scale developments on infrastructure has not been assessed especially for Tring and Berkhamsted.</p>

	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.
Include files	
Number	Question 11
ID	LPIO2210
Full Name	Mrs Melanie Flowers
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The focus should be on brownfield sites within the main towns rather than greenfield and particularly greenbelt sites. They should be focused on where there is a sustainable housing need (ie with easy access to jobs, schools and healthcare) rather than where land owners and developers are eager to take the opportunity to develop their land and make huge profits.
Include files	
Number	Question 11
ID	LPIO2242
Full Name	Mr Jason Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt land should not be considered in the Local Plan.
Include files	
Number	Question 11
ID	LPIO2316
Full Name	Mr George Bull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>While Section 5.4 - Issue 4 contains much that can be supported, at the recent public meeting in Tring organised by DBC, the council representatives made it clear that none of the sites which are currently the subject of the consultation have actually been selected by the Council. Instead, each site has been offered by current landowners, the majority of whom are development companies.</p> <p>The Council has a clear duty to support the provision of housing in its area, but it has an equally clear duty to act in accordance with its own adopted policies and in the interests of its residents. For the purposes of this consultation, that requires the Council to approve first the development of brownfield and other sites before even contemplating development in the Rural Area and the Green Belt.</p>
Include files	
Number	Question 11
ID	LPIO2372
Full Name	Dr Nick Hodsdon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>There should be no development on the Green Belt Developments leading to coalescence of villages or loss of their character should not be permitted</p> <p>The infrastructure is beyond capacity, the scope to improve this in Apsley and Kings Langley is very limited and this should be a key consideration when selection sites.</p> <p>The proposed Shendish development in particular has no obvious means of access without cause significant congestion in Apsley</p>
Include files	
Number	Question 11
ID	LPIO2465
Full Name	Mr Timothy Copeman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt development should not be considered in the scope of this document. Before any plans can be

	submitted a full review of the implication of that development have to be considered and agreed through a public consultation process. The outcome of this will need to be acted on and not ignored.
Include files	
Number	Question 11
ID	LPIO2549
Full Name	Mr Kevin Kelly
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The selection of sites appears to have been decided by being those that have been offered for development rather than any selection process of the best fit for purpose sites within the development areas.
Include files	
Number	Question 11
ID	LPIO2562
Full Name	MRS Lesley Culley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	These comments relate primarily to BERKHAMSTED. Actually I agree in part with your proposed criteria. Dacorum has done very well in Berkhamsted on developing brownfield sites. These should continue to be the priority until the land runs out. The policy has led to a welcome increase in town centre density making Berkhamsted a buzzier place with more pedestrians enjoying town centre life. As for greenfield sites, I suggest you should prioritise sites within walking /biking distance of the station or the main road thus reducing the need for car journeys. NO development on the tops of ridges should be undertaken - sites are cold, windy, exposed and involve steep ascents/descents to the town. So in Berkhamsted the land south of the town adjacent to the by-pass should be ruled out. Ridge top developments are also visually ruinous to the Chilterns landscape. Chilterns towns are characteristically valley towns. The land along the valley towards Bourne End (adding to the Townsend Drive site?) would be better (If you can avoid flood risk!), also up ivy house lane or around the cricket club area. As Northchurch is virtually joined to Berkhamsted already any greenfield sites there might as well be used.

Include files	
Number	Question 11
ID	LPIO2584
Full Name	Mrs Marriott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There is no brownfield register currently available for Dacorum. Please provide this so the communities can see where land is available. You are currently promoting land put forward by developers who don't know and don't care about the local communities and the long term impact.
Include files	
Number	Question 11
ID	LPIO2602
Full Name	Mr John Morrish
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenfield sites do not belong in the plan. Brownfield sites/ lowgrade land only and why is DBC only now doing a call for brownfield sites? Shouldn't this have been properly conducted before publishing plans that are sacrificing green belt unnecessarily so the real numbers would be clear?
Include files	

Number	Question 11
ID	LPIO2646
Full Name	Mr Alan Andrews
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No building on greenbelt land. Give wildlife a chance
Include files	
Number	Question 11
ID	LPIO2732
Full Name	Mr James Puddiphatt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenfield sites MUST be excluded from this plan.
Include files	
Number	Question 11
ID	LPIO2790
Full Name	mrs Gillian Hooper
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The policy should be to ONLY develop brown field sites.
Include files	
Number	Question 11
ID	LPIO2793
Full Name	mrs Gillian Hooper
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	brownfield sites should ONLY be used.
Include files	
Number	Question 11
ID	LPIO2804
Full Name	Mrs Carol Chandler
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 11
ID	LPIO2806
Full Name	Mrs Carol Chandler
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 feel I must state my opposition to the proposed building of up to 3,580 houses in this village. This will more than double the population and erode the definition of it being a village – more an outpost of Watford or Hemel Hempstead. Much of what keep Kings Langley alive and thriving is its community spirit. How can this be maintained when its heart and soul are proposed to be threatened.</p> <p>I am not opposed to the building of new home – we need to progress – but I think the infrastructure has not been considered. Recent developments (like the Ovaltine and Apsley Lock) have added 1000's more cars on the roads and passengers on the railways and they are all at breaking point.</p> <p>Cars – the potential development could add more than 3,500 cars to the village and surrounding areas. The A4251 is already gridlocked in the mornings and evenings with people trying to get out or return to the village making their journeys impossible and very slow. Not good for the environment or for those travelling. How the addition of those extra cars/delivery vehicles etc. etc. can be accommodated I don't know and hasn't been considered. In addition, recent developments have been approved without sufficient parking spaces (look at Red Lion Road which is parked on both sides) so parking needs to be considered. There isn't enough parking in</p>

the village itself or even in Hemel or Watford so how will these urban centres accommodate so much extra traffic?

With traffic at a standstill or crawling at the moment, the addition of so many extra cars would mean access for emergency vehicles would be impossible.

Railways - As a commuter from Kings Langley to London for the last 30 years, I have seen the numbers of passengers grow year on year. I frequently don't get a seat in a morning and often can't get in the Car Park at Kings Langley station (even with the increased capacity that was added a few years ago). Having consulted with London Midland they assure me there is no more capacity on the line to add extra trains so cant alleviate the crush by adding to the frequency. The platforms also got lengthened a few years ago to accommodate longer trains so that is also at full capacity. The addition of additional houses will only make this worse.

Schools - I note there is a junior school proposed in the Rucklers Lane development, but no additional secondary school places. 3,580 homes might reasonably be expected to contain 3,500 children, with approximately one third of these being of secondary school age. That's 1,200 extra secondary school places. Rudolf Steiner School in Kings Langley is also under threat (although I hope this doesn't happen) but that could mean an additional 500 places. How exactly does the plan deal with the additional 1,700 secondary school places?

Doctors - The existing medical facilities (2 great Surgeries in the village) have grown over the years but physically don't look to be able to expand and certainly wont be able to cope with doubling the population – how will this be catered for? The proposed addition of retirement homes will increase the likelihood of additional medical support for the elderly – how will this be provided?

Green Belt Sites – All 4 proposed sites in Kings Langley are Green belt. As I said, I am not opposed to development but the village can not cope with anything of this size. I especially want to mention Wayside Farm. This is one of only 2 working dairy farms in the county of Hertfordshire, and, as such, is a precious resource. The farm is not only a great working asset to the village but also a community hub for children and adults alike. We should be supporting working farms and the production of milk and food not proposing their closure. Many people love the village and its rural setting to access the field and countryside. The addition of so many cars and losing green belt land will do untold damage to the environment – once its gone, its gone.

Therefore, to sum up, I am opposed to the proposed doubling of the size of Kings Langley and the use of green belt land. Please look at developing the brown field sites in proposal 1A.

Include files	
Number	Question 11
ID	LPIO2848
Full Name	Mr Paul Mcpherson

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No kings langley is a village. Refer to other more suitable towns that can cope with more housing and people
Include files	
Number	Question 11
ID	LPIO2865
Full Name	Mr Antony Harbidge
Company / Organisation	Berkhamsted Residents Action Group (BRAG)
Position	Chairman
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"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns.

	<ul style="list-style-type: none"> Gardens are “Greenfield” sites and development should be discouraged as indicated in the Government, White paper.
Include files	
Number	Question 11
ID	LPIO2912
Full Name	Dr Rachael Frost
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No. Points 5.4.2 to 5.4.4 seem to be a way to sneak in small amounts of development as does considering the Apsley development separately. A combination of many small developments plus big developments is going to increase infrastructure demand. Additional major considerations should include: where provision of ADEQUATE housing can be best provided including places most suitable for flats vs houses and social housing and affordable housing provision. The selection process seems to omit mention of anything related to the ability of the area to support them through infrastructure and resources. This should be included. The option to keep land to allocate for use in the future seems to be a way to spring more development on residents in five years without further consultation.
Include files	
Number	Question 11
ID	LPIO2940
Full Name	Mr John Lunn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Building and expanding existing towns with all the infrastructure in place should be first priority. Villages and greenbelt/rural areas should not be used unless sufficient infrastructure is in place, first.
Include files	
Number	Question 11
ID	LPIO2956
Full Name	Mr Ivor Eisenstadt
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenfield sites should not be considered ahead of safeguarding brownfield sites for future development. This is illogical.
Include files	
Number	Question 11
ID	LPIO3004
Full Name	Mr Paul Stanbridge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	What is meant by the term ""safeguarding"" these sites for development beyond the plan period"?
Include files	
Number	Question 11
ID	LPIO3038
Full Name	Mr John McCombe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Broadly, yes, though it needs to be emphasised that Green Belt development is a very last resort
Include files	
Number	Question 11
ID	LPIO3067
Full Name	Mrs Carolyn Hill
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 strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should also be accompanied by an assessment of their impact on infrastructure. For example, the topography and linear nature of development in Berkhamsted creates particular constraints.</p> <p>It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being suggested in the Market Towns of Berkhamsted and Tring. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.</p>
Include files	
Number	Question 11
ID	LPIO3072
Full Name	mr hugh siegle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Growth should be focused on the locations most capable of accepting it. The towns and villages and Green Belt land away from Hemel Hempstead are not. Brownfield should be a priority and higher density schemes should be encouraged and the Council should be more ambitious. To suggest that a site capable of providing 3,000+ new homes cannot be expected to make any real contribution to housing need before 2036 is plainly nonsense. There are plenty of examples close to Dacorum where go-ahead councils have facilitated large scale rapid development. This also has the beneficial effect of lowering new house prices making them more affordable</p>
Include files	
Number	Question 11
ID	LPIO3112
Full Name	Mr John Whiteman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	The approach to site selection is flawed as it starts from individual proposals and then uses a piecemeal and tick-box method of evaluation. It is an invitation to landowners to promote their sites for their profit without recognition of the costs involved for the community. Development of this scale should start from an assessment of the optimal location for dramatic additional housing, and work downwards to sites.
Include files	
Number	Question 11
ID	LPIO3144
Full Name	Mr John Walker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Infrastructure developments is a prerequisite
Include files	
Number	Question 11
ID	LPIO3196
Full Name	Mrs Alicia Southgate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We should not use green belt sites - all other options should be fully explored first. The housing requirement is not within the villages, therefore the housing needs from urban areas should not be impacting the villages.
Include files	
Number	Question 11
ID	LPIO3229
Full Name	Mr George Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Green belt land should not be included. DBC must make all efforts to use brownfield land and underused land including surplus public sector brownfield land. There are many empty brownfield sites including the Lucas Aerospace site at Maylands in Hemel. Maylands has already been used for new housing so could have more. Also AT Olivers in Home Park Works
Include files	
Number	Question 11
ID	LPIO3263
Full Name	Mrs Margaret Stanier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Consideration also needs to be given as to whether sites are likely to provide sufficient affordable housing.
Include files	
Number	Question 11
ID	LPIO3280
Full Name	
Company / Organisation	Premier Property Acquisition
Position	
Agent Name	Mr Jonathan Buckwell
Company / Organisation	DHA Planning
Position	Director
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We generally agree to the approach set out. It is right that the Local Plan is realistic about that quantum of development that can be secured during the plan period from very large scale development, especially where hundreds or thousands of houses are proposed on strategic sites in one ownership.
Include files	
Number	Question 11
ID	LPIO3340
Full Name	Mrs Victoria Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites only developed
Include files	
Number	Question 11
ID	LPIO3354
Full Name	Mrs Diana Calderwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Selecting sites should be concentrated on brownfield sites. Possible consideration of green field site along with great caution. Certainly Green Belt should remain as Green Belt land and remain protected. It is this that creates and defines the character and amenity of our towns and villages.
Include files	
Number	Question 11
ID	LPIO3363
Full Name	Mr B. Bradnock
Company / Organisation	
Position	
Agent Name	Miss Lydia Prince
Company / Organisation	DLP Planning Limited
Position	Planner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please see paragraph 2.22 to 2.27 in attached report.
Include files	Local Plan Issues and Options (6)
Number	Question 11
ID	LPIO3383
Full Name	Mr Phil Sawyer
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Use empty buildings and brownfield sites , not the Green Belt

Include files	
Number	Question 11
ID	LPIO3418
Full Name	Mrs Ann Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Sites should be selected on their suitability, quality and effect on the surrounding infrastructure and not on their size alone.</p> <p>Green belt boundaries should only be reviewed when all other options have been exhausted.</p> <p>Development should be centered on regenerating land within the three main towns. Including housing within town centres which will help regenerate them.</p>
Include files	
Number	Question 11
ID	LPIO3475
Full Name	Mrs Louise Saul
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Greenbelt should remain greenbelt and be protected.
Include files	
Number	Question 11
ID	LPIO3501
Full Name	Mr Ashley Martin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>DBC have been too eager to identify green belt sites, giving undue credence to developers and the purported benefits that they say will accrue. Brownfield sites MUST have priority as well as higher density development in Hemel Hempstead.</p>

Include files	
Number	Question 11
ID	LPIO3570
Full Name	Mrs Sandra Jackson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>You state "When sites are put forward for consideration, we must consider whether they are (a) available, (b) suitable, and (c) achievable. If a site does not meet these requirements, then we cannot allocate it in the Plan." The four sites identified within King Langley are neither available, suitable or achievable. They are all Green Belt, not one is brownfield.</p> <p>Further, you state "However, even if we encourage higher densities / taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or densities to fully meet our future growth needs." Then you must reduce down the future growth calculations.</p> <p>This area is full, no more development should be permitted.</p>
Include files	
Number	Question 11
ID	LPIO3641
Full Name	Mr Andrew Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I remain unconvinced about the ability to protect green belt and AoNB and not significant priority placed on brown field sites, such as Bovingdon Aerodrome, disused wings at Hemel Hempstead General Hospital and empty plots on Maylands Avenue.
Include files	
Number	Question 11
ID	LPIO3648
Full Name	Mr Gruff Edwards
Company / Organisation	Dacorum Environmental Forum Waste Group
Position	Chair
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Re "Greenfield Sites" 5.4.13 and "As brownfield sites are a finite resource, it is likely that we will need to rely more on greenfield opportunities", the fallacious implication is that Greenfield Sites are an infinite resource. Unless the cycle of new housing demand figures leading to further massive losses of greenfield sites is challenged those sites too will be seen to be finite. A characteristic of this cycle is that sites ruled out on by the environmental assessments of one generation of planners and inspectors are re-assessed and downgraded in value by subsequent, often external, assessors, a process of softening them up for development. The history of West Hemel Hempstead (now LA3) illustrates this:</p> <p>The pre-deposit consultation Technical Report 3 of the Dacorum Borough Plan first review to 2011 assessed five parcels of land (A to E) collectively termed "West Hemel Hempstead", of which only parcel A (400 Houses) was selected for the then-proposed development strategy. Parcel B was seen as "a natural area for open space linking with Shrub Hill Common", while Parcels C, D and E were "considerably more prominent" (than Parcel A) "and should remain undeveloped". Parcel A was "the most suitable for development as it is very well screened in long views - - - However it is prominent in views from Fields End Estate".</p> <p>The original selection of Parcel A by the Borough proved, at the subsequent Examination in Public at County level, to be a bridgehead for the developers to press their case for even more housing at West Hemel Hempstead, increasing what was already (at that time, but dwarfed by proposals in the current consultation) the largest Green Belt land take in the Borough to include most of the other, previously-rejected parcels, including the "natural area for open space linking with Shrub Hill Common". This demonstrates clearly that the original decision to select even Parcel A, and thereby to breach the long-established urban boundary was a mistake, because once the line was broken, the whole area was rendered vulnerable.</p> <p>Now LA3 comprises all of Parcels A to E.</p>
Include files	
Number	Question 11
ID	LPIO3650
Full Name	mr jason funnell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	any person or company who neighbour propped sites should know well in advance of the plan being published
Include files	
Number	Question 11
ID	LPIO3661
Full Name	Ilyn horne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Brownfield must be the priority as greenbelt, farm land and wildlife sites must be protected for our future generations.</p> <p>Also, conversion of existing empty premises must be considered as an option. Such as converting the land used by empty warehouses, offices etc.</p> <p>For example, there are offices in Kings Langley that are being converted to flats which is great - but it seems that the plan still wants to propose building offices as part of a development on Wayside Farm In Kings Langley. this seems crazy. Especially given that during Priminister's Question Time on the 6th December - the PM was asked if our farmers would be supported and encouraged given Brexit and our need to produce our own food and milk. She was very clear that they would be.</p>
Include files	
Number	Question 11
ID	LPIO3686
Full Name	Mr Brian Connor
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 11
ID	LPIO3752
Full Name	Mr Anthony Warren
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Key transport links don't consider the poor quality of other rail links to the east "ThamesLink" and the regular gridlocking of local roads around junction 9 to St Albans
Include files	
Number	Question 11
ID	LPIO3810
Full Name	Mrs Suzette Phair
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The current approach is encouraging landowners to put forward green belt land which wouldn't ordinarily be considered, rather than actively identifying non green belt sites as the priority.
Include files	
Number	Question 11
ID	LPIO3820
Full Name	Mr Michael Arrowsmith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Use of brownfield sites and dispersion of the the required deveopment with the appropriate infa structure should be the priority.
Include files	
Number	Question 11
ID	LPIO4023
Full Name	Mr Charles Bayley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	A more long term strategic approach is need which should include the option of a few larger developments

	rather than the random selection of developments based on the understandable desires of landowners. What is needed is a much better thought through long term plan. The need for additional housing is accepted but the present method of allowing yet more infilling and nibbling at the village boundaries will eventually lead to a terrible sprawl which would suit nobody.
Include files	
Number	Question 11
ID	LPIO4025
Full Name	Mr R. Latham
Company / Organisation	
Position	
Agent Name	Miss Lydia Prince
Company / Organisation	DLP Planning Limited
Position	Planner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please see paragraph 2.22 to 2.27 in attached report.
Include files	Local Plan Issues and Options (22)
Number	Question 11
ID	LPIO4045
Full Name	Mr Alan Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Dacorum has not given serious consideration to brownfield development, the potential offered by land which is currently underused, optimising the proposed density of development or exploring whether other authorities can help to meet some of the identified development requirement (and then only with the support of local people). These should all be prioritised ahead of Green Belt development in Kings Langley (or any of the other towns and villages). One simple example is the Westside office block, London Road, HP3 9TD which has been empty for years compared with Pinnacle House which is being developed in Abbots Langley. Dacorum must look closer at delivering housing need through making most efficient and effective use of brownfield sites across the Borough, but focussed on the 3 largest towns.
Include files	
Number	Question 11
ID	LPIO4072

Full Name	Mr Andrew Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brown belt is fine by me. It gives more opportunity for developers to make money, with an already suitable foundation. Once that has gone, you look to building more new town such as Milton Keynes and the like - growing small villages just doesn't work. It kills the soul of the area and make residents frustrated and unhappy.
Include files	
Number	Question 11
ID	LPIO4073
Full Name	Mr M. Chester
Company / Organisation	
Position	
Agent Name	Miss Lydia Prince
Company / Organisation	DLP Planning Limited
Position	Planner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please see paragraph 2.22 to 2.27 in attached report.
Include files	Local Plan Issues and Options (38)
Number	Question 11
ID	LPIO4116
Full Name	Mr D. Smith
Company / Organisation	
Position	
Agent Name	Miss Lydia Prince
Company / Organisation	DLP Planning Limited
Position	Planner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please see paragraph 2.22 to 2.27 in attached report.
Include files	Local Plan Issues and Options (54)
Number	Question 11
ID	LPIO4123
Full Name	Mr Graham Hoad
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In case of Tring, larger development should be discouraged. Many brownfield sites in Tring have been developed for housing at the expense of facilities or employment. Change of use of previously developed sites should be judged on truly redundant uses not private economic advantage.
Include files	
Number	Question 11
ID	LPIO4195
Full Name	Ms Alison Sams
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I strongly support maximisation of development of brownfield sites
Include files	
Number	Question 11
ID	LPIO4252
Full Name	Mrs Caroline Hargrove
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	5.4.6 When sites are put forward for consideration, we must consider whether they are (a) available, (b) suitable, and (c) achievable. If a site does not meet these requirements, then we cannot allocate it in the Plan. I don't disagree with this but struggle to see how this is included and then later in this document you propose Wayside Farm, Hill Farm and Rectory Farm, never mind Shendish (already gridlocked)
Include files	
Number	Question 11
ID	LPIO4256
Full Name	Mrs Caroline Hargrove

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	5.4.3 I regard it as unacceptable to try to phase large developments using this wording - it feels like "lets try to get the bare minimum in now" so the full development cant be stopped later Kings Langley cannot sustain the thousands of houses proposed partially or in total
Include files	
Number	Question 11
ID	LPIO4259
Full Name	Mrs Caroline Hargrove
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Access to major routeways is a huge existing problem for the residents of Chipperfield, Bovingdon and Kings Langley already but not noted as an issue for the borough despite proposals for further developments
Include files	
Number	Question 11
ID	LPIO4289
Full Name	Mr Bruce Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Stating that large scale (3000 + dwellings) would put substantial pressure on the local infrastructure is of great significance. The plan clearly ignores the cumulative impact of multiple smaller developments. Looking at Berkhamsted as an example it has overdelivered on its local planned build rate (>30% ahead) and suffers from a lack of parking, awful traffic jams at peak times, and a poor water supply when it gets mildly warm (numerous demand related interruptions this summer). The reward appears to be to get lumbered with even more. The emphasis may well need to be more radical with new towns and higher density housing where appropriate but

	the plan seems to have excluded the difficult decisions before heading out for consultation.
Include files	
Number	Question 11
ID	LPIO4340
Full Name	Mr David Hannah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	With regard to Be-H3, I fail to see how a site that has been ruled out by Dacorum planners on multiple occasions due to fundamental topographical and infrastructural weakness can now have advanced this far in the process. No fundamental physical factors have changed since the last rejection, yet time and resources are wasted on all sides in having to highlight this to DBC.
Include files	
Number	Question 11
ID	LPIO4354
Full Name	Mr Adrian Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The proposal is self defeating. Brownsites will be considered first/there are not enough brownsites/greensites will be considered. I know that around Kings Langley there is a sensible amount of brownsite opportunities that coul contribute to te national and regional requirement. At a stretch the infrastructure could and should find a way of adapting to the increased usage - road improvements, increased medical support, mote trains etc. Beyond this will be urban sprawl and community gridlock.
Include files	
Number	Question 11
ID	LPIO4413
Full Name	Mr Robert Bailey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I don't agree that a large new town site would take any longer to build than a number of smaller sites in the long term as infrastructure can then be sensibly built in at the time and not squeezed in inappropriately afterwards.
Include files	
Number	Question 11
ID	LPIO4636
Full Name	Mr Adam Trigg
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites should always be considered first. If proposed homes are included in brownfield sites only thus keeping the green belt intact this will benefit not only those who live on or close to greenbelt but also the families who live in new brownfield developments as part of their wider environment.
Include files	
Number	Question 11
ID	LPIO4680
Full Name	Mrs Maria Kennedy
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 11
ID	LPIO4685
Full Name	Mr Keith Bradbury
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 11
ID	LPIO4766
Full Name	Mrs Joanna Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites must have priority. Sites capable of very large scale development over a number of years should not be ignored - including possibility of a new Garden Town. No building on green belt land, make sure green belt can not dressily be re-designated as brownfield.
Include files	
Number	Question 11
ID	LPIO4851
Full Name	
Company / Organisation	Watson Howick
Position	
Agent Name	Mrs Julia Riddle
Company / Organisation	Castle Planning
Position	Director
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We encourage the identification of a variety of sites over the Plan period, as set out and support the approach in terms of identifying sites to meet growth needs, but only specifically identifying sites which will support development of over 10 units.</p> <p>It is vital that the Plan makes provision for development over the Plan period, but also that it is realistic in identifying sites which can easily deliver development early in the Plan period to meet identified need, or in the event that some sites do not come forward as anticipated. Sites, even when identified, will not necessarily come forward as anticipated, therefore it is essential that the Plan is flexible enough to respond to this and identify sites which will be able to come forward during the Plan period to meet needs throughout that time.</p> <p>Sites should be considered against the criteria of; availability, suitability and deliverability. These factors should be considered in the wider assessment of sites, even when these sites are within designations such as Green Belt. There are sites which meet these criteria, which do not exhibit the full characteristics or functions of their designations, which can make a valuable contribution in terms of the delivery of development in</p>

	<p>the Plan period. For example there are sites around Tring, which are deliverable early in the Plan period and could make a significant contribution to the delivery of a range of homes in a sustainable manner in the short term, for example site tr-h4 at Station Road/ Cow Lane.</p> <p>Furthermore, sites such as that at Cow Lane/ Station Road may also be able to fulfil other objectives, such as;</p> <ul style="list-style-type: none"> • Being of a suitable scale to deliver homes and other benefits without undue pressure on infrastructure. • Being capable of early delivery, due to limited preparation required. • Not being dependant on delivery of key infrastructure. <p>This site can also make a significant contribution in terms of facilitating the delivery of other, larger sites, such as tr-h5. Its delivery would enable linkages from tr-h5 through to wider transport links, to assist in the future delivery of these larger sites, which in turn, will make a longer term contribution to the more significant growth required in Tring.</p> <p>Where sites deliver development in a comprehensive and timely manner and particularly where they assist in the sustainable development of other identified sites, the benefits of this should be balanced against landscape and environmental criteria. Provided that overall these issues can be balanced appropriately, such sites should be included in the Plan and this this means of assessment should used in their identification.</p> <p>The Plan recognises the need to consider green field and Green Belt sites as part of the process and this is supported, as set out in Question 9.</p>
Include files	
Number	Question 11
ID	LPIO4881
Full Name	Mrs Beverley Griffiths
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Development should be focussed on brownfield sites and urban regeneration where derelict, run down unsightly sights can be turned into aspiring places to live. There is potential for this in Hemel Hempstead but it is also key to protect the green spaces which are already there and increase the funding for Hemel which will encourage more aspiring families to live and work there.
Include files	
Number	Question 11
ID	LPIO4902

Full Name	Mr Pdraig Dowd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Provided you provide a much improved wider set of planning objectives and a strategy to deliver them without any regard to landowners offering plots, you have some reasonable approaches o selecting sites.</p> <p>One constraint that needs to be introduced today even before 2030 plan is the density that you approve through infill f existing plots and their redevelopment together wth any consideration of their accumulated impact on traffic, services, others, etc. Berkhamsted is a good example where it takes 30 minutes to travel from Northchurch to the other end of the town to get to Hemel wth all of the fumes, pollution, etc.</p> <p>Another is parking as you have totally ignored it with less and less capacity today and resulting in commuters parking a mile away outside residences resulting in slow traffic, inconvenience, reduced quality of living, etc. this leads onto general traffic logistics, access, etc. that will otherwise reduce or eliminate areas for development.</p>
Include files	
Number	Question 11
ID	LPIO4958
Full Name	MR Russell Berman
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 Council's own estimation says we can cope with 50 more homes, yet this is for 1,000s without any consideration to the impact on infrastructure. I am not in favour of using our valuable green belt for over-development, when there isn't the proven demand – properties lay empty or on the market for longer periods than other areas of the country.</p> <p>I want to see maximisation of the brownfield sites already identified and better use of existing sites such as the former BT offices in Apsley as a higher priority.</p> <p>The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns.</p>

	<p>Gardens are “Greenfield” sites and development should be discouraged as indicated in the Government White paper.</p> <p>Keeping our environment safe needs stricter controls from our Councils, the statement of 'considering how we can incorporate this into the Plan', doesn't go far enough, and we know from past experience that developers do more than originally suggested, and the environment is always sacrificed. We are lucky enough to have a beautiful surroundings, with wildlife and trees that need protection. We already have high pollution levels and the volume of building work being proposed will make for an unhealthy borough. Therefore keeping the green open spaces for the next generation should be of high importance.</p>
Include files	
Number	Question 11
ID	LPIO4977
Full Name	Mrs Nicola Botha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt should be protected at all costs. In kings Langley the development of apsley will already put immense increase in infrastructure pressure and continue to turn the village into a single line of traffic in/out
Include files	

Number	Question 11
ID	LPIO4980
Full Name	Ms Anette Corbach
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 11
ID	LPIO5020
Full Name	Mr Chris Lumb
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 disagree with the intention that small sites that would accommodate fewer than 10 dwellings should be entirely discounted, since if there turned out to be a significant number of such sites, the very real contribution that these offered would effectively lead to an over-provision, above the number determined as reasonable to foresee. Perhaps a nominal 'guesstimate' figure for such sites should be included, to take account of this.</p> <p>Similarly, I disagree that it should be acceptable to totally discount any potentially very large sites (of 3,000 or more dwellings), since although it might take a number of years to complete such a large site, there would in all probability be some degree of 'phasing' in the development, such that valuable numbers of houses would be built well before the end of the period of the plan. Again, not to make some allowance for such houses would only tend to result in over-provision in the medium term.</p> <p>It is also implied (in 5.4.3 above) that it would be only the 'ultra-large' sites that would impact on the available infrastructure, but this is clearly a flawed approach, since if there are a significant number of smaller sites, the cumulative effect of these, taken as a whole, will also severely affect the existing infrastructure - and of course this means roads and parking, as well as schools, community provision, medical facilities, and the supply systems for utilities such as water, electricity, gas, sewage, etc.</p> <p>It is not only brownfield sites that can be considered for higher-density housing though the use of taller buildings; these should also be considered for other sites that are</p>

	<p>identified or that become available. In fact, care should be taken to prevent developers from attempting to maximise profits by only building larger properties at a low housing density, rather than smaller properties that would come at prices that could be attained by first time buyers - and this means at least 50% or less than the prices currently asked for the so-called 'executive' houses which are not going to meet the needs of young families and young workers.</p> <p>It would be really good to see some sites throughout the Borough being allocated for council-provided, reasonably-priced housing, such as that currently being built at Swing Gate Lane in Berkhamsted, and preferably with some form of 'shared-equity' purchase system available, since this is the only way to achieve attainable prices for young people.</p>
Include files	
Number	Question 11
ID	LPIO5068
Full Name	Mrs Lucy McRae
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please reconsider development of brownfield sites before even starting to look at the greenbelt areas. This country is rapidly running out of countryside.
Include files	
Number	Question 11
ID	LPIO5129
Full Name	Mrs Christine Ridley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In the Site Appraisal document, the Technical Studies Assessment has advised certain areas of the Green Belt should be excluded from further assessment and retained as Green Belt. - landscape sensitivity high . However, in spite of this advice, they have been included in the proposed development plans. Surely these areas ought to be left as they are and excluded from any further development plans.
Include files	

Number	Question 11
ID	LPIO5241
Full Name	Mrs Catherine Anderson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Providing brownfield sites are used first and maintain the character of the surrounding district
Include files	
Number	Question 11
ID	LPIO5266
Full Name	Mr Gary Ansell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I do not agree with only including potential sites of more than 10+ units as this does not reflect the true impact of such development sites, particularly infills, on a village like Kings Langley. Over the years many such site shave come to be built on all adding houses to the village and swelling its size. Before building on any Green Belt options, DBC must take into account all potential alternative sites, regardless of minimum size. This means a thorough appraisal of all brownfield sites that can be identified.
Include files	
Number	Question 11
ID	LPIO5315
Full Name	Miss Giulietta Cinque
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Council should not be considering anything other than Brownfield sites in the first instance. Is Kings Langley actually where AT LEAST an additional 3580 people will want to live and is it the best place for them?

	<p>The council should be considering more high rise developments in the main town in the Borough rather than spreading homes at ground level.</p> <p>The Council should protect the Greenbelt and consider all urban and Brownfield sites before considering anything that impacts on the Green Belt. There should be a long term policy to protect the Green Belt from any form of development.</p> <p>Transport infrastructure and linked assessments should be completed before proposed areas for development are published and should be available for public comment as part of this process not later once areas are finalised. It's clear the Kings Langley proposals will have a serious impact on what is already a challenging congestion issue in and around the high street and on local roads for parking where there is already inadequate parking provided for existing developments.</p>
Include files	
Number	Question 11
ID	LP105478
Full Name	Mr Garrick Stevens
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Dacorum planners made it 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.</p> <p>The market towns and large villages were identified as Areas of Limited Opportunity. In Table 1: Settlement Hierarchy of Core Strategy it is stated that - "The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs."</p> <p>Significant Green Belt release on the edge of the Berkhamsted and Northchurch settlement will clearly breach these policy assurances.</p> <p>The current household build rate per annum in Berkhamsted is nearly twice that targeted, so that at the current rate the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be considered when assessing development numbers and site options.</p>
Include files	
Number	Question 11

ID	LPIO5519
Full Name	Mr Robert May
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	All existing farmland should be preserved. The future following Brexit and with climate change is uncertain. All current farmland whether used for dairy, crops or biofuel must be retained for future need of these crops. Once its gone its gone
Include files	
Number	Question 11
ID	LPIO5575
Full Name	Mr Michael Ridley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Why has Bovingdon Airfield been excluded?
Include files	
Number	Question 11
ID	LPIO5586
Full Name	Mrs Samantha Pilling
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In Kings Langley, we are the 'pointy' end of a triangle. Our roads are already at a standstill between 6am-9am and 4pm-6pm (often later) from Apsley all the way to the M25. Despite there being the A41, a lot of local traffic drives through the village to access Abbots Langley, Bedmond, Apsley, Watford and Hemel Hempstead. We have three schools in our immediate village with many people walking, cycling and driving to school. We are a historic village dating back to around 1050BC. As such the village has grown organically, with a grid of small, narrow roads. There is NO ROOM to improve the road infrastructure. Building thousands of new homes in the village is

	<p>ludicrous. Fire Engines and Ambulances struggle to get through as it is. Adding thousands of more cars to our roads is, quite frankly, ridiculous.</p> <p>I am not against development of Brown Field sites in the village. I am happy for us to take a 'share' of the new development but the proposal plans for Wayside Farm, Rectory Farm, Hill Farm and Shendish will kill our village community forever.</p>
Include files	
Number	Question 11
ID	LPIO5610
Full Name	Mrs Christine Cosgrave
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 11
ID	LPIO5634
Full Name	Mr Nigel Vanner
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>There needs to be a detailed cost analysis of proposals as part of their selection. This analysis needs to consider all the hidden long term infrastructure costs (eg transport) and not just focus on short term provision of housing.</p> <p>All brownfield sites must be considered ahead of anything else especially as these are likely to be in areas where infrastructure is already present.</p>
Include files	
Number	Question 11
ID	LPIO5670
Full Name	Mr Alastair Greene
Company / Organisation	Little Gaddesden Parish Council
Position	Clerk
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	
Include files	
Number	Question 11
ID	LPIO5676
Full Name	Mr Quentin Ross-Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We must protect Green Belt land for future generations. Losing this land will alter the character of a village like Kings Langley. We could lose a local farm which provides education to so many, which kids today are lacking. We can't live without food and knowledge of how it is produced must be at the forefront of everything we do in society.
Include files	
Number	Question 11
ID	LPIO5734
Full Name	Mr Adrian Ward
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 11
ID	LPIO5735
Full Name	Dr Lucy Murfett
Company / Organisation	Chilterns Conservation Board
Position	Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	<p>Support the approach to maximise use of brownfield sites, and identifying the AONB as a very important factor in assessing where development should be located.</p> <p>The Chilterns Conservation Board recommends the Council undertakes further detailed work on the impacts of developing sites (both individually and cumulatively) on the Chilterns AONB. We would be willing to assist with the scope and brief for such work, which should include landscape and visual impact assessment as well as coverage of effects on tranquillity, ecology, water abstraction from chalk streams, air quality, dark skies etc.</p>
Include files	
Number	Question 11
ID	LPIO5860
Full Name	Mr Grahame Partridge
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"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure.
Include files	
Number	Question 11
ID	LPIO5925
Full Name	Ms Fiona Coulling
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Only after Brownfield sites are exhausted and further consideration of increasing density has been exhausted should green field sites be considered.</p> <p>Then this should be in keeping with the scale of the existing development and infrastructure</p>
Include files	
Number	Question 11
ID	LPIO5928
Full Name	Mr Michael Lelieveld
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>It seems that the site selection process is largely driven by availability and desire of landowners to sell land for housing development (and developers preference for sites that are both more profitable and easier to build on - e.g. Green Belt areas over Brownfield). Indeed, most of the sites have been put forward with specific schemes in mind which are wholly unconnected with any assessment of local housing need (both number of dwellings and housing type), appropriate locations for the necessary infrastructure and services (including GPs, schools and recreational facilities) and transport links. It is not clear that vendors would be willing to sell if part of their site had to be used for such services rather than housing. It is particularly striking how little some vendors and developers appear willing to contribute to local services and infrastructure. This would be inconsistent with the policies set out in 4.3 and the views of Dacorum planners when developing the current Core Strategy, as well as policy CS1 of this Strategy.</p> <p>It is hard to understand why sites of 3000+ dwellings have been excluded from the assessment. Inclusion of such sites would allow a proper assessment of the benefits of much larger developments alongside the promotion of smaller sites in the Market Towns where it is already clear that, in the case of Berkhamsted, recent schemes have placed an unsustainable burden on local infrastructure to the point that the town has some significant deficits. The Council should revisit this in the next phase of the process and undertake a targeted review of the cumulative impact of recent schemes.</p> <p>We strongly support the prioritisation of Brown Field sites where they can be developed sustainably and with the necessary infrastructure.</p> <p>See also our response to question 8 regarding the fact that Berkhamsted has built 34% above target in the first 10 years of the current Core Strategy is also relevant here.</p>
Include files	

Number	Question 11
ID	LPIO5983
Full Name	Mr Paul Craig
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 11
ID	LPIO6126
Full Name	Dr Melvyn Else
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The fact that sites are brown field in-developed urban areas that are available, suitable and achievable does not appear to mean in the eyes of DBC that they are able to make a contribution to the borough's housing needs. . The designation of sites, that could make a positive contribution to housing requirements, as open land appears a luxury that cannot be afforded unless Green Belt land is to be continually eroded. Open land sites are not the same as Open Space. Open Land sites have no public access, they can be and are someone's back garden but such a designation means they are much harder to bring into the planning circle and as such cannot contribute to reducing the erosion of the Green Belt in a manner that would be the case under normal circumstances. Open Land is a Dacorum concept, used by very few others. Most prefer the Open Space designation where public access is available and unnecessary restrictions are not placed on what otherwise would be land in urban areas available for housing development
Include files	
Number	Question 11
ID	LPIO6182
Full Name	Mr Scott Bennett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt land should never be considered in your plans
Include files	
Number	Question 11
ID	LPIO6188
Full Name	Mrs Helen Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites should be looked at first, taking into account the impact on the local infrastructure.
Include files	
Number	Question 11
ID	LPIO6218
Full Name	Miss Lucy Muzio
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green belt land should not be being considered at all, especially on Hemel plans working farms and the only scenic place left in Hemel and the loss of all the public bridleways. What a disgusting loss to hemel to lose all the nice open space it has left. T
Include files	
Number	Question 11
ID	LPIO6220
Full Name	Mr Nicholas Ring
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	When sites are put forward for consideration they must also be sustainable in terms of the local infrastructure. They must respect the character of the local environment which has developed over the previous generations.
Include files	
Number	Question 11
ID	LPIO6258
Full Name	Mr Brian Goddard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The infrastructure does not allow for more housing in Berkhamsted
Include files	
Number	Question 11
ID	LPIO6264
Full Name	Mr andrew miller
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt & AONB should be excluded from developemnt plans, Brownfield sites should not be over developed that creates 'other' issues (e.g. parking etc.)
Include files	
Number	Question 11
ID	LPIO6287
Full Name	Mrs Beryl Irvine
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 11
ID	LPIO6326

Full Name	Miss Tamara Felstead
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I believe that care should be taken to not further merge the village of KL into the adjacent towns and certainly not by eroding green belt land. The village has a specific and important historical character that should be preserved and the environment shouldnt be sacrificed.
Include files	
Number	Question 11
ID	LPIO6415
Full Name	Mrs anna silsby
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 wording used in the statement is too vague. For example "maximise the use of brownfield" sites does not mean anything. This is not quantified in volume terms; nor is explained. The general reference that the Government requires Dacorum to demonstrate that brownfield sites have been fully explored does still not suffice. The Council should be more creative and actively try to source new brownfield sites; convert existing office or business sites to housing before even contemplating greenfield sites.</p> <p>Greenfield sites again is too generic a definition. There is and should be in the prioritisation a clear difference between greenfield sites in urban areas and greenfield sites that are part of the Greenbelt. Greenfield Greenbelt sites should be approved only if the local residents - in majority - approve of the development and if the development is accompanied by an improvement in local infrastructure so that can be proven that the infrastructure - in the widest sense of the word - can accommodate the new development (ie. parking, road safety, school places, GP, dentists etc).</p>
Include files	
Number	Question 11
ID	LPIO6416
Full Name	Mrs Rachel Macdonald
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Because you have to take in to account the amount of building that has been taken on smaller site. Developing a site which once had one house and then this is replaced by 9 houses effects infrastructure and local resource such as schools and GP surgeries. For example Mortimer Hill in Tring, 3 houses where redeveloped into approx 27 houses. These kind of developments effect the area. None of these houses were affordable.
Include files	
Number	Question 11
ID	LPIO6453
Full Name	Mr Patrick Walsh
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Inadequate protection for Green Belt and insufficient exploration of alternatives such as brownfield sites.
Include files	
Number	Question 11
ID	LPIO6518
Full Name	Mrs Laura Bainbridge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There are already so many problems relating to lack of parking and traffic jams that any new developments will significantly worsen access and movement of traffic.
Include files	
Number	Question 11
ID	LPIO6522
Full Name	Mr Andrew Lambourne
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The option of a larger coherent development rather than large-scale filling-in around towns and larger villages should be re-examined since it would potentially offend less people and deliver associated infrastructure and amenities more effectively, rather than attempting to piggy-back on already stretched resources. In other words, if you're going to do it, then do it right.
Include files	
Number	Question 11
ID	LPIO6626
Full Name	Helen Cole
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 strongly disagree with the use of brownfield sites if it means change of use from business to residential. It is vital from a sustainability point of view that small towns retain places of work for residents reducing travel and improving quality of life, and also bringing in valuable money to the local economy.</p> <p>I also strongly disagree with use of the green belt when its purpose is to define a town or village boundary.</p> <p>I would be in favour of developing green belt in the case of building a completely new town or village providing suitable infrastructure was also put in place to support it.</p>
Include files	
Number	Question 11
ID	LPIO6681
Full Name	Mr Nick Hollinghurst
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>There is a fundamental flaw in the current local plan process.</p> <p>The system is not set up to produce an overall strategy, or even a series of localised strategies. It relies on a call for sites to be proposed - almost without any serious justification or valid planning reason other than that the proposers owns the site.</p> <p>This means that every bit of every proposed site must be seriously considered, even if it is without apparent merit or conformity with previous development history. It will however have its passionate, eloquent, forceful and persuasive advocates.</p> <p>Other land, however, no matter how sensible, helpful or desirable it might be to develop it, either as it stands or as part a larger development, will not be considered at all if it is not a response to a call for sites.</p> <p>This means it is not always possible for Planning Authorities to develop a coherent strategy (at worst) or have to bat away distracting proposals (at best).</p>
Include files	
Number	Question 11
ID	LPIO6833
Full Name	Mrs Susan Richards
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.
Include files	
Number	Question 11
ID	LPIO6846
Full Name	Mrs Jenna Selby
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 11
ID	LPIO6890

Full Name	Bradford Gunn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The key guiding principle stated above and throughout the local plan is the protection of Green Belt Land. Despite this fact and as highlighted above a number of available Brownfield sites have not been identified and / or seriously considered for development. At this late stage it is time for the compulsory purchase of remaining brownfield sites if we are serious about protecting Green Belt land. This needs to be done now and not in 5 years time when vast tracks of Green Belt land will have been lost forever.
Include files	
Number	Question 11
ID	LPIO6915
Full Name	Mr John Richards
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town
Include files	
Number	Question 11
ID	LPIO6941
Full Name	Mrs Anna Corrigan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Same reasons given previously
Include files	
Number	Question 11

ID	LPIO6948
Full Name	Mr Edward Castle-Henry
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Why cant we reach capacity too, that must be an option. Large scale developments are the worst for imposing on the landscape, so I really hope we do not see that. If there are no more brownfield sites remaining, it becomes difficult to weigh up the need for housing vs the environment.
Include files	
Number	Question 11
ID	LPIO6966
Full Name	Dr Jane Hughes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.
Include files	
Number	Question 11
ID	LPIO7023
Full Name	Miss rebecca holt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I understand that greenfield sites need to be looked at, however the site schedule shows that the sites put forward as completely inappropriate for development and therefore brownfield sites must be considered first and should be detailed for our review in the same way.
Include files	

Number	Question 11
ID	LPIO7035
Full Name	Mr Alex Taylor
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I have concerns that the analysis of the proposed site at Bank Mill Lane, Berkhamsted does not take account of the impact on local conservation areas (how can you conserve an area whose character is defined by a wide open space of grassland by building houses?), impact on wildlife (residents have observed numerous species who use this area as a key habitat) and right of light and privacy to neighbouring houses, not to mention the flood zone impact on future residents.
Include files	
Number	Question 11
ID	LPIO7058
Full Name	Mrs Gillian Lumb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	More energy should have been put into finding brown field sites for development. And also into sites where social and lower cost houses could be built.
Include files	
Number	Question 11
ID	LPIO7101
Full Name	Mr & Mrs Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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

Q 11.

Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG RESPONSE TO Q11 (FULL DOC ATTACHED TO Q46)

Question 11

Do you agree with the proposed approach to selecting sites?

No

It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies

to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is

plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no

contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.

Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure.

This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).

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.

The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns.

Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper.

Include files

Number	Question 11
ID	LPIO7144
Full Name	Mrs Barbara Bedford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Kings Langley Like everyone, I recognise that some development is necessary. The proposals put forward do not appear to sufficiently look at brown field sites but at sites put forward by those hoping to profit from development whose interests are not that of the community.
Include files	
Number	Question 11
ID	LPIO7151
Full Name	John & Barbara Driver
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Before building any new houses on 'Green Belt', 'AONB or designated 'Conservation' Areas the public has to be assured that: (a) all 'Brown Field Sites' in Dacorum have been identified, fully assessed and evaluated for house building. (b) all Government/State owned land within Dacorum has been identified, fully assessed and evaluated for house building. e.g. land owned by; MOD/RAF such as Bovingdon Airfield on which I guess a whole new village could be built in excess of 1000 houses. National Health Service, National Rail/Rail Track, Water Authorities, etc. Herts County Council such as Education and Highways Authorities etc.
Include files	
Number	Question 11

ID	LPIO7186
Full Name	Mrs Moira Graham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I object strongly to the use of green belt for housing.
Include files	
Number	Question 11
ID	LPIO7188
Full Name	Mrs Fiona Walsh
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I am against development on green belt. However it is unrealistic to suggest that no development is necessary. I would like to see Brownfield sites used before green belt however. Have all empty buildings been considered before looking at further developments. I am aware of a lot of renovated office buildings in Kings Langley and surrounding areas that are empty. Can these not be used?
Include files	
Number	Question 11
ID	LPIO7207
Full Name	Joanne O'Sullivan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The greenbelt should not be developed at all. There maybe brownfield areas that can be considered if the services are put in place to help current and new residents
Include files	
Number	Question 11
ID	LPIO7210

Full Name	Anna Penning-Rowsell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The proposed development is in green belt and developing would be against central government planning guidance
Include files	
Number	Question 11
ID	LPIO7260
Full Name	Mr Phillip Armstrong
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	What Brown Field sites has DBC considered in this exercise ?
Include files	
Number	Question 11
ID	LPIO7264
Full Name	Anthony Batkin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Finally Mrs. May (PM) stated that 'Green Belt' is to be kept Green Belt and that 'Brown Field Sites' should be used first.
Include files	
Number	Question 11
ID	LPIO7312
Full Name	Brian and Heidi Norris
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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 11 (please note full document is attached to Q46)</p> <p>Question 11</p> <p><i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <p><input type="checkbox"/></p> <p>It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies</p> <p>to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is</p> <p>plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no</p> <p>contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.</p> <p><input type="checkbox"/></p> <p>Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure.</p> <p><input type="checkbox"/></p> <p>This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).</p> <p><input type="checkbox"/></p> <p>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</p> <p>considered fully before the easy option of Green Belt release.</p>

	<input type="checkbox"/> The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. <input type="checkbox"/> Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO7388
Full Name	Mr Clive Birch
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>It is totally erroneous to exclude large sites of 3000+ in the larger conurbations such as Hemel since delivery is firstly simpler by way of logistics, secondly can be phased as in Bicester and aylesbury and thirdly are less costly to build per unit. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.</p> <p>From a sustainability viewpoint and best use of available land brownfield sites should be used before Green Belt sites are considered not forgetting of course an assessment of their impact on infrastructure.</p> <p>Gardens are “Greenfield” sites or Green lungs and development should be discouraged. see Govt, White paper.</p>
Include files	
Number	Question 11
ID	LPIO7392
Full Name	Mr Francis Watson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Even in the 1500’s there was a “green belt” around London to protect the status quo. In modern times the “Green Belt” was invented in the mid 1900’s. The main</p>

	<p>thinking behind this idea was to prevent further urban sprawl and to improve or retain the conditions existing for wildlife. In this respect, nothing has changed.</p> <p>It is accepted that there is a shortage of housing in this country which needs to be addressed. Building on green field sites is not the answer. It has been proved that many urban areas have sufficient brown field sites that can be utilised for additional building without impacting on the countryside we have around the area. Once houses (or indeed industrial buildings) have been erected on Green Belt sites, the land can never be reclaimed and will be lost for ever for future generations. It has also been proved that large developers have been sitting on substantial land banks until they consider a time when they can make most profit (most of these are in urban areas).</p> <p>I understand that Dacorum Borough Council have estimated that they can provide the number of houses that the Government has determined and these can be built on existing and planned areas. However, DBC are looking at Green Belt sites if the current projections substantially increase.</p>
Include files	
Number	Question 11
ID	LP107436
Full Name	Marco and Leanne Galer-Reick
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Personally, I am hugely concerned about the obvious and blatant flaws in the proposals which I would be prepared to challenge legally if necessary.</p> <p>How can you possibly propose such a loss of Green Belt when green belt land can only be built on in exceptional circumstances and every other alternative should have been explored first?</p> <p>The green belt is protected and rightly so, your proposal even conflicts your own strategy to minimise impact on green belt and safeguard the countryside. Once built on, the green belt is gone forever.</p> <p>I have also not seen a proper assessment of an actual necessity specifically in Bovingdon to provide these additional homes. It was suggested by the councillors at last week's extraordinary meeting that the land in questions is being considered only because the land owners have come forward. Surely that's the tail wagging the dog?! How can you possibly consider protected land without a thorough assessment and considering any alternatives simply because a private person wants to earn money from selling land? This process is entirely flawed and must be objected; it should never have come</p>

	to these proposals given national government's stance on protecting our green belt.
Include files	
Number	Question 11
ID	LPIO7452
Full Name	David Charlesworth
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><u>Brown field</u></p> <p>In particular, however, the potential use of existing brown field sites is not transparent. These should be fully utilised before any use of green belt is considered. There are no brown field proposals in the Land Plan, and it is not clear what sites already have planning consent but are yet to be built upon. Nor is it indicated what existing buildings, such as offices, could be redeveloped into housing, or what planning consent has already been given for building projects which have not been completed. Such opportunities might well exist at Westside Business Centre, the People building site, Diamond Point on the Maylands estate and the Hertfordshire County Council complex at Apsley, to name a small selection</p>
Include files	

Number	Question 11
ID	LPIO7525
Full Name	Robert Stephens
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Whilst recognising that Dacorum will probably have to build additional housing, I am not in favour of using Green Belt land to do so.</p> <p>To varying degrees the other options would:</p> <ul style="list-style-type: none"> • Cause a loss of amenity and landscape • Suffer from inadequate road and public transport networks. • Place additional stress on schools and medical facilities • Alter, for the worse, the village's social and historical identity.
Include files	
Number	Question 11
ID	LPIO7530
Full Name	Mrs Cath Dickins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In terms of existing brownfield sites, has DBC looked into the Government's intention to introduce a new permitted development right which would allow commercial building to be demolished and replaced with residential homes? Has the DBC earmarked suitable commercial properties that could be used for houses ?</p>
Include files	
Number	Question 11
ID	LPIO7647
Full Name	Phillip Armstrong
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	What Brown Field sites has DBC considered in this exercise ?
Include files	
Number	Question 11
ID	LPIO7717
Full Name	Mr Edward Castle-Henry
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I wanted to register my concern about the new plans being put forward for building on green belt land. As for building on green belt land, I feel that it should be protected, to prevent an urban sprawl rolling out from London and up the country. It is part of the reason Hertfordshire is so nice due to the countryside easily available from the towns and villages throughout this county. Is it not possible to target brown belt land for want of a better word, which would regenerate run down areas, and make good use of eye sore land, instead of encroaching into our natural environment
Include files	
Number	Question 11
ID	LPIO7764
Full Name	Dipak Lalsodagar
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I understand that DBC is obliged to build a 603 houses per annum. The house building should not be carried out at greenfield sites, but should instead make use of existing brownfield sites.
Include files	
Number	Question 11
ID	LPIO7786
Full Name	Caroline, Mark & James Smith
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Not to mention the proposed sites offered by local landowners are also Green Belt. Green belt surely is not an option and should never be an option. Look to other sites which are more suitable rather than those offered and preferably sites which are brownfield
Include files	
Number	Question 11
ID	LPIO7788
Full Name	Andrea Bartlett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I therefore summarise what I see as the primary necessary goals here. 1 Green belt must be maintained. This is essential to maintain the character of the countryside and ensure retention of distinct villages, towns and cities. All new development should be focused on brownfield redevelopment as a critical priority. This not only forces redevelopment of neglected sites, but reduces the pressure on green belt
Include files	
Number	Question 11
ID	LPIO7807
Full Name	Mr Alan Debenham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Environmental impact – as outlined in the plan, building on Green Belt is a non-preferred option, impacting on our wildlife, village character and amenities.
Include files	
Number	Question 11
ID	LPIO7830

Full Name	IMELDA DEMPSEY
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I would like to know what brown field sites you have explored in TOWNS which can clearly take more development ie Tring, Berkhamstead, Hemel Hempstead?
Include files	
Number	Question 11
ID	LPIO7834
Full Name	MR ROBIN POWELL
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We fully appreciate the need to build more houses as our population increases and people live longer, but to build on Greenbelt sites should be a last resort and we feel that much more investigation can be undertaken to develop the many Brownbelt sites which have become vacant in the area.
Include files	
Number	Question 11
ID	LPIO7838
Full Name	REBECCA CLARKE
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There are many brownfield sites, which could be utilised in preference to these green belt areas, without diminishing the attractiveness of our beloved and much sought after village .
Include files	
Number	Question 11
ID	LPIO7839

Full Name	MR RICHARD LAWRENCE
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There are many brownfield sites,which could be utilised in preference to these green belt areas,without diminishing the attractiveness of our beloved and much sought after village
Include files	
Number	Question 11
ID	LPIO7853
Full Name	Dr Peter Chapman
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 11
ID	LPIO7937
Full Name	Mr Norman Groves
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 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 Q11</p> <p><input type="checkbox"/></p> <p>It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies</p> <p>to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is</p>

	<p>plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.</p> <p><input type="checkbox"/></p> <p>Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure.</p> <p><input type="checkbox"/></p> <p>This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).</p> <p><input type="checkbox"/></p> <p>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><input type="checkbox"/></p> <p>The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns.</p> <p><input type="checkbox"/></p> <p>Gardens are “reenfield” sites and development should be discouraged as indicated in the Govt, White paper.</p>
Include files	
Number	Question 11
ID	LP107987
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	It must be the case, as has been stated many times by Ministers, that there should be maximisation of development of brownfield sites before greenfield and Green Belt sites are considered. Their use must take full account of their impact on all aspects of infrastructure.

	<p>Far too much weight is given to Green Belt sites that are estimated to deliver in the early years of the plan period.</p> <p>The cumulative impact of small scale developments including windfall on infrastructure requirements must not be underestimated and should be assessed especially in our market towns. DBC has consistently under-valued windfall gains, especially those from commercial-to-residential conversions which have become much more significant since the relaxation of planning restrictions which had limited commercial-to-residential conversions.</p>
Include files	
Number	Question 11
ID	LPIO8045
Full Name	Mrs Samantha Pilling
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>1 <u>Use of Brown Field Sites</u></p> <p>According to Government guidelines, Brown Field sites must be your first option and all alternatives exhausted before even considering Green Belt Sites. I am not confident that this is the case.</p> <p>Relying on the public to find Brown Field sites for you and add them to your register is not investigating this option exhaustively.</p> <p>Only one Brown Field site is even mentioned in the strategy documents</p>
Include files	
Number	Question 11
ID	LPIO8061
Full Name	Mr Michael Youngman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Green Belt system was specifically designed to prevent the type of urban sprawl that is now being proposed in the 4 sites around Kings Langley. Please

	honour the ethos of Green Belts and confine any developments to Brownfield sites. I object to any developments on Green Belt land.
Include files	
Number	Question 11
ID	LPIO8084
Full Name	Mark & Anita Hutchings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Although we appreciate that there is a housing shortage in the area and that there is a continual pressure from central government for this to change in the county, the development of Green Belt areas to achieve this should not be being considered. Yes to the development of Brown field sites, but no to Green Belt development.
Include files	
Number	Question 11
ID	LPIO8089
Full Name	MR DAVID GALE
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	To start using Green Belt land around the surrounding villages would totally change the nature and character of our Borough. By expanding their populations it would put increased demands on their already stretched facilities and infrastructure and would be severely detrimental to the whole Borough.
Include files	
Number	Question 11
ID	LPIO8093
Full Name	Mrs Valerie Gale
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	To start using Green Belt land around the surrounding villages would totally change the nature and character of our Borough. By expanding their populations it would put increased demands on their already stretched facilities and infrastructure and would be severely detrimental to the whole Borough.
Include files	
Number	Question 11
ID	LPIO8099
Full Name	MRS MARY THOMSON
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	3. I consider insufficient allowance has been made for brownfield housing development, existing building redevelopment, and windfall sites, which could replace/reduce any need for intrusion into the Green Belt
Include files	
Number	Question 11
ID	LPIO8131
Full Name	Dr Jason Tisdall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I therefore summarise what I see as the primary necessary goals here. 1 Green belt must be maintained. This is essential to maintain the character of the countryside and ensure retention of distinct villages, towns and cities. All new development should be focused on brownfield redevelopment as a critical priority. This not only forces redevelopment of neglected sites, but reduces the pressure on green belt.
Include files	
Number	Question 11
ID	LPIO8176
Full Name	John Battye

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As a resident of Dacorum I shall be responding in full to the recent consultation on the Local Plan but in the meantime I would like to put forward a couple of sites where new housing might be sited. When considering the issues and options paper I was struck by how few publicly owned proposals were put forward even though the Government is expecting the public sector to play a leading role. Driving around Hemel Hempstead I have noted the large tracts of empty grassland in the Gadebridge and Queensway areas. These areas were clearly conceived when the New Town was planned in the immediate aftermath of WW2. Nearly 70 years on they have become a luxury which the residents of Dacorum as a whole can ill afford. Our Green Belt is being steadily eroded, notwithstanding Government policy to protect it, and yet these swathes of greenfield land are not being considered. The desperate shortage of land for building in Dacorum argues for difficult but imaginative solutions. Clearly these areas have amenity and biodiversity value (though the lack of hedges and scant tree cover argue for rather limited ecological benefits) but when compared to some of the threatened Green Belt sites they are surely subsidiary. A recent census of the occupation of the football pitches in the Gadebridge area at a time of maximum use suggested that some consolidation, thereby releasing a reasonable tract of land for building, would not reduce required capacity. Better use of tree-screening could reduce the impact on surrounding areas and actually improve biodiversity.</p> <p>Again, the difficult decisions that we face require sacrifices; the character of all parts of Dacorum is threatened and at least partial use of these throwbacks to post-war planning should at least be being considered.</p>
Include files	
Number	Question 11
ID	LP108207
Full Name	Mr Keith Ward
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 not clear to me – despite careful reading of the (possibly deliberately over-complex) documentation –

that **all avenues of brownfield development have been explored/exhausted**. Surely these must be 100% exhausted before any green belt usage is even contemplated, and just a cursory walk around the parish or drive around the wider borough (and beyond, which I believe is relevant under legislation) generates more questions than answers in this regard. The Maylands estate and areas in Leavesden stick out like a sore thumb in this regard, and even parts of Apsley, Abbots Langley and Hemel itself offer further opportunities. But finding information regarding consent is extremely difficult. I am not, by nature, a conspiracy theorist, but again I am left wondering if this is by accident or design; does it suit a wider purpose that this is so well hidden?

One thing which is abundantly clear is that there are **areas which have been granted planning permission** - albeit commercial - **which remain undeveloped**, presumably due to lack of demand or property speculation which could be quite easily amended for residential use without utilising/vandalising green belt land. I cite Diamond Point and the 'People' site in Hemel as obvious examples; these are just the obvious ones; no doubt others exist.

Why too, have the planners been so **selective in what is, and is not, included in its plans**? So far as I can see, neither the proposed developments in Three Rivers or the 'Two Waters Masterplan' have been taken into account. Both have the potential to add significant housing development and vastly improve the ambiance and quality of life in these areas (as has already happened as a consequence of the recent Maylands Avenue housing association development). Why is this? It seems to me significant development plots are available which are being omitted from this proposal, and I am at a loss to understand exactly why.

Include files	
Number	Question 11
ID	LPIO8217
Full Name	Mrs Suzanne Nixon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>WHERE TO BUILD</p> <p>Brownfield sites must have priority. The Greenbelt must be protected. It is an invaluable asset and should remain so for future generations. Current policy is to protect the Greenbelt and this must remain in place. It is important with regard to quality of life and for environmental reasons.</p>

Include files	
Number	Question 11
ID	LPIO8246
Full Name	Mr Christopher Talbot-Ponsonby
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As far as existing green lungs within the town they should be kept intact as far is possible. Green space is the heart and lungs of the town and losing pockets on the outskirts make it all the more important to keep.
Include files	
Number	Question 11
ID	LPIO8281
Full Name	Elizabeth Afonso
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Building on green belt should only ever be a last resort, and is not something that is actively supported by the government. With numerous brownfield sites outlined and other sites with better potential for improved infrastructure and services, destroying the character of one of West Hertfordshire's most loved villages should simply not be on the cards.
Include files	
Number	Question 11
ID	LPIO8289
Full Name	Mrs Annie Wheeler
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Government stance is that Green Belt should only be developed in very special circumstances with substantial weight given to any harm that a development would cause. Special circumstances are clearly not the

	case, in this instance, as there are many other sites that could be utilised. Even Dacorum's own consultants recommended that the areas Green Belt status be maintained.
Include files	
Number	Question 11
ID	LPIO8307
Full Name	Mrs Karen Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Greenbelt land and laws were created for a reason to protect our environment, wildlife and to distinguish villages from being merged into towns and losing their identity, to over write these for the sake of meeting overinflated targets is a serious mistake and brownfield sites must be considered as a first option which as I drive around Hemel and Bovingdon there are many brownfield sites that are able to absorb many of these new homes.
Include files	
Number	Question 11
ID	LPIO8373
Full Name	GILLIAN JOHANSSON
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 interesting that no brown field site has been identified and selected for possible development and only Green Belt sites, which have been put forward by owners themselves are being considered. Given that the government directive is not to build on the Green Belt, we would have expected Dacorum to have had a plan for additional housing to be close to jobs to alleviate all the points mentioned above and to follow government guidelines to prioritise brown field sites rather than waiting for land owners to offer their Green Belt sites.
Include files	
Number	Question 11

ID	LPIO8380
Full Name	Mrs Sarah Rees
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).

	<ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White
Include files	
Number	Question 11
ID	LP108395
Full Name	Helen & Stuart 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>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.</p> <p>However, we would like to take this opportunity to emphasize just a few of the most important points within that response</p> <p>How can a brownfield site be overlooked in favour of a greenfield site? Surely it is time to build a completely new garden town rather than consistently adding to existing locations until they cease to function. Schools/doctors etc can be planned from the outset.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an

	<p>opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White
Include files	
Number	Question 11
ID	LPIO8411
Full Name	Spencer 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>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> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p>

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
 - Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on
 - This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
 - 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
 - The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market
 - Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White

Include files	
Number	Question 11
ID	LPIO8434
Full Name	Mr Peter Shell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

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.

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
- Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on
- This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
- 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
- The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market
- Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper.

Include files	
Number	Question 11
ID	LPIO8473
Full Name	Mrs Pat Berkley
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) have responded in full to the 'Issues & 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.</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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.

Include files	
Number	Question 11
ID	LPIO8492
Full Name	Mr Lawrence Sutton
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • Inclusion of higher density developments in appropriate areas of Hemel is not addressed

	<p>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</p> <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO8606
Full Name	Penny and Roger Riseley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We am sure there must be other sites which offer potential for the additional housing need, especially previously developed sites of lesser amenity value and with far less practical difficulty of development and subsequent utilisation.
Include files	
Number	Question 11
ID	LPIO8657
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- No development of Green Belt or greenfield sites, especially farms.</p> <p>2- We need farms to provide food, which will become a pressing issue when we leave the EU.</p> <p>3- The Green Belt and other greenfield areas a vital for the health and sanity of the local populations.</p>
Include files	
Number	Question 11

ID	LPIO8698
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	<p>The large scale development proposed by the Council:-</p> <ul style="list-style-type: none"> • is far too big for the size of Berkhamsted and the services we enjoy; • would put further unacceptable strain on already overloaded infrastructure; • greatly exceeds the needs of our community; • would result in an unacceptable spread of urban built environment currently restricted for good reason by the Green Belt; • would adversely affect the character of our historic market town; and <p>ignores other areas e.g. Hemel Hempstead that are more appropriate for high density development.</p>
Include files	
Number	Question 11
ID	LPIO8804
Full Name	Richard and Pru Murray
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>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.</p>
Include files	
Number	Question 11
ID	LPIO8874
Full Name	mrs susan stier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Q11-NO-larger sites of 3000 plus should be considered , and developed slowly so infastructure comes with them.
Include files	
Number	Question 11
ID	LPIO8985
Full Name	David Johnson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No I strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure.
Include files	
Number	Question 11
ID	LPIO9007
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	I strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure.
Include files	
Number	Question 11
ID	LPIO9070
Full Name	Ian Dickins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	DBC have not explored and exploited the opportunities afforded by re-development of brownfield sites around Hemel & Berkhamsted. These sites could support the volume of housing that DBC need to contribute to the country's housing requirements and equally important has the infrastructure to support the increased population. Both Hemel and Berkhamsted have the core infrastructure capacities and equally are much more suited to expanding those services. It is understood that development of brownfield sites is more expensive than greenfield sites but it is not acceptable to destroy green belt land, which has protected the more rural communities and provided definition to the area, purely on commercial ease. Good quality developments support both the community and the individuals, not just the developer.
Include files	
Number	Question 11
ID	LPIO9098
Full Name	LeverstockGreenVillageAssociation
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We also urge that more is done to utilise every available brownfield site before any consideration is given to building on precious Green Belt.
Include files	
Number	Question 11
ID	LPIO9119
Full Name	Claire Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I support building in brownfield sites, I support getting unused homes back into use, but I don't support ANY building on green belt.
Include files	
Number	Question 11
ID	LPIO9159
Full Name	S Langley
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.
Include files	
Number	Question 11
ID	LPIO9254
Full Name	Neil Francis
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	To whom it may concern, My family and I live in Kings Langley. We are dismayed at the amount of proposed housing developments that will take away the countryside that helps to make our little town what it is and are vigorously opposed to any such developments. The government supports the development of brownfield sites, not green belt land which I fully support the redevelopment of; sensible, not damaging to the environment and in keeping with the 'strong protection of our green belt' as suggested by the Chancellor in his Autumn Statement
Include files	
Number	Question 11
ID	LPIO9259
Full Name	Neil Francis
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	So our request is simple....aim for the brownfield sites that our national government is suggesting, not the precious green belt land that seems to be an easy target, but which would have a devastating impact as to the local area and the people living in it.

Include files	
Number	Question 11
ID	LPIO9276
Full Name	barry & patricia groves
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It would also seem to us that many of the proposed development sites under the Plan are developer led rather than Council led.
Include files	
Number	Question 11
ID	LPIO9341
Full Name	PETER RHODES
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Surely areas of brownfield should be built on first with numerous areas like this existing
Include files	
Number	Question 11
ID	LPIO9351
Full Name	Donna Edwards
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	- I cannot support the development of green belt land when across the county there are brownfield sites more able to accommodate development. These should be considered ahead of developments in already over populated areas
Include files	
Number	Question 11
ID	LPIO9382

Full Name	Mr Brian Connor
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 would like to comment as part of the consultation on the proposed new Local Plan, and object in the strongest possible terms, to the potential development proposed for greenbelt land in Kings Langley.</p> <p>I am a resident of Kings Langley, having specifically located there 7 years ago, due to the particular village character, to raise our family.</p> <p>- There is ample brownfield land available within the borough to meet the demand, without destroying greenfield sites forever</p>
Include files	
Number	Question 11
ID	LPIO9491
Full Name	Rosalind Partridge
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	4. Prioritise the development of brownfield sites
Include files	
Number	Question 11
ID	LPIO9524
Full Name	Ted Carroll
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 feel building on Greenfield land should be a “red line” – at this time of Brexit, we need food security and it will not be achieved if we build on greenbelt, agricultural land</p> <p>I had very strong concerns when I read this statement:</p>

	<p>“In 2014 and 2015 we asked developers and landowners to let us have details of sites that they felt were suitable for a range of developments, including housing, through a “call for sites” exercise. Information on additional sites is still coming forward. The majority of land promoted through this process was large sites in the Green Belt.”</p> <p>It is clearly in the interest of these groups (Landowners, Housing Developers) to sell and build on green belt land – why not let residents have a stronger voice. Developers are likely to put forward green belt sites in preference to brownfield sites “held in reserve”.</p> <p>I feel we should be exploring:</p> <ul style="list-style-type: none"> • higher density housing in small towns and larger towns such as Hemel Hempstead • more affordable and starter homes – and less executive homes build on the green belt • homes with good transport links and less than half a mile from stations or good bus services. <p>Dacorum is a great place to live – there is an opportunity to be bold and modern thinking about housing provision and transport links. – this plan is presenting old thinking</p>
Include files	
Number	Question 11
ID	LPIO9528
Full Name	Sarah Wragg
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	. My biggest issue is the use of greenbelt land. I am sure that there are enough brownfield sites in our part of Hertfordshire that could be developed before you take away green space that we will never get back
Include files	
Number	Question 11
ID	LPIO9544
Full Name	Jackie Burwell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	I feel strongly that it would be much more acceptable to use Brownfield sites and to respect the Green Belt and Rural Area policies for the areas in question.
Include files	
Number	Question 11
ID	LPIO9618
Full Name	Mrs Lucy McRae
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I do understand that more housing is required in this area and across the country, but please consider brownfield options before building on our beautiful greenbelt areas and permanently ruining them for now and our future generations.
Include files	
Number	Question 11
ID	LPIO9626
Full Name	dr kim goode
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Just in case my comments on the site don't come through, can I make it clear that I am totally opposed to building on greenbelt land. Alternatives must be found. The need for housing could be reviewed; exploration of underused houses [there are a row of four, four bedroomed houses in Kings Langley with one elderly resident in each house]; more energy put into finding unused buildings and brownfield locations. Building on greenbelt could be reviewed case by case, but in principle there is no argument for a change in policy.
Include files	
Number	Question 11
ID	LPIO9665
Full Name	RUTH ISBELL
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 opposed to the destruction of the character of this village and I am against any development on precious Green belt sites, especially when there is the clear possibility of using Brownfield sites in the Borough.</p> <p>I consider it really important that Kings Langley maintains its identity as a village and doesn't spread out to become extensions of Watford or Hemel Hempstead.</p> <p>It isn't rocket science, Brownfield land should be used for any future housing development</p>
Include files	
Number	Question 11
ID	LPIO9731
Full Name	Brendon Sparks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brown Field sites must have priority. DBC has in fairness has utilised this option in Hemel Hempstead. There remain further sites that can be developed.
Include files	

Number	Question 11
ID	LP109756
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • Inclusion of higher density developments in appropriate areas of Hemel is not addressed in any detail in the proposed approach. More

	<p>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> <ul style="list-style-type: none"> The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LP109804
Full Name	Mr Paul Wardle
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 & 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>4. All brown field sites across the Borough should be considered and developed before any green belt land is released.</p> <p>5. Empty derelict / properties should be targeted.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site

	<p>of 3000+ offer best opportunity to provide the necessary additional infrastructure.</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO9902
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	<p><u>Brownbelt Sites</u> – With the current economic climate, there are more and more Brownbelt sites becoming vacant. When I drive through the Maylands Avenue industrial area there are a number of vacant sites. I recently drove towards Hemel Hempstead train station and just beyond Aldi, there are vacant buildings. There are retail outlets becoming vacant all of the time as the high streets continue (and will continue to) struggle with the threat from e-Commerce. When there are so many Brownbelt sites which could be developed to meet the housing shortage, why do we need to build on greenbelt land? The Ovaltine development worked very well and a potential site for further development is Bovingdon aerodrome which already has the transport links. I urge you again to please re-consider the Greenbelt sites and take a longer term view of the impact</p>

Include files	
Number	Question 11
ID	LPIO9905
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	Office Development On Greenbelt Land – I understand part of the development on the greenbelt sites is for offices and I assume this is to support the Government's National Planning Policy Framework to "Support development which encourages economic growth and the creation of sustainable communities." I fail to see how the building of offices on Greenbelt land supports this. There are a lot of vacant offices in Dacorum and the surrounding area so adding more vacant buildings to replace Greenbelt land does not support economic growth. Businesses are struggling to move to this area because the transportation infrastructure is not adequate to sustain a consistent workforce. Surely a better, longer term plan is to utilise vacant properties rather than developing Greenbelt land
Include files	
Number	Question 11
ID	LPIO9923
Full Name	Mr Richard Sidwell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>When I was a child and became aware of the ever expanding city of London, I realised that many wonderful villages over time had been swallowed in its relentless march outwards. Highgate, Hampstead, East Barnet, Harrow, Barnes, Greenwich, to name but a few. Then in a school geography lesson one day I learnt about the Green Belt. WOW, what an extraordinary idea and what a great protection for our countryside, nature and open spaces.</p> <p>As I got older I used to then drive through a green belt of land from London to the M25 & always smiled at the vision & forward thinking of this ideal. A place for people to breathe away from the urban sprawl, to exercise for their wellbeing both physically & mentally, a green</p>

	<p>corridor & space for nature & wildlife to cling to the city edge which without, our world will come tumbling down.</p> <p>So, when I learn that Dacorum are even considering destroying Green Belt, I was totally gobsmacked. This land is sacrosanct, this land is untouchable, this land protects us from ever encroaching urbanisation and coalescence, and this land belongs to us, the people. The clear message is we DO NOT want our green belt touched, built over, destroyed by our council. It MUST be protected at all cost. I am aware of the need for more housing, but every single square inch of brownfield & infill land must be used first, and there is plenty of it in Dacorum.</p>
Include files	
Number	Question 11
ID	LPIO9950
Full Name	Karen Bruce
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I understand that some houses need to be built to reach demand, but why can't the Brownfield sites be used?
Include files	
Number	Question 11
ID	LPIO9956
Full Name	JAMES BURWELL
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I feel strongly that Brownfield sites should be used before Green Belt land, and building developments in Hertfordshire should be restricted to areas where there is the space and access to make them viable within existing communities. This is not the case in Kings Langley or Shendish. If building is necessary, I would prefer Options 1A or 1C which would not include building on land at Shendish, prioritising the preservation of the Green Belt land we value so highly
Include files	
Number	Question 11
ID	LPIO9979

Full Name	mr Kevin Smith
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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

	<p>but only if it is considered fully before the easy option of Green Belt release.</p> <ul style="list-style-type: none"> The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO10027
Full Name	Jill Mewha
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. <ul style="list-style-type: none"> Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use

	<p>should be accompanied also by an assessment of their impact on infrastructure.</p> <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market Towns. • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO10096
Full Name	Melanie Frankel
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p>

	<p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO10144
Full Name	Natalie Crane
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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.

Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
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 - 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
 - The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market
 - Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.

Include files	
Number	Question 11
ID	LPIO10201

Full Name	Mr Tim Beeby
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11(please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). 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

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Include files	
Number	Question 11
ID	LPIO10248
Full Name	John and Jane Beeley
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site

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Include files	
Number	Question 11
ID	LPIO10298
Full Name	Kathleen Lally
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 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>. I agree entirely with the BRAG response to your plan.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would

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Include files	
Number	Question 11
ID	LPIO10346
Full Name	J&P Savage
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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.

Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
 - Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on
 - This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
 - 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
 - The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market
 - Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.

Include files	
Number	Question 11
ID	LPIO10401
Full Name	CHRIS CUMMINGS

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The use of brownfield areas in the area should be prioritised (including ensuring current domestic and commercial properties are fully utilised) as should further expansion of the larger settlements where sustainable growth is more manageable and less detrimental to the green spaces and wildlife.
Include files	
Number	Question 11
ID	LPIO10412
Full Name	Mr Daniel Parry
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site

	<p>of 3000+ offer best opportunity to provide the necessary additional</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO10461
Full Name	David 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>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, <u>I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name</u></p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including</p>

the possibility of a properly planned new Garden Town.

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
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Include files	
Number	Question 11
ID	LPIO10511
Full Name	Mr Stephen Doughty
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 & 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>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LP1010559
Full Name	Mr Roger Petts

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) 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> <p>...</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper

Include files	
Number	Question 11
ID	LPIO10606
Full Name	Simon Chilton
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • Inclusion of higher density developments in appropriate areas of Hemel is not addressed

	<p>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</p> <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LP1010656
Full Name	Sally and David Williams
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 as support for BRAG's submission.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).

	<ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO10704
Full Name	Mrs Jenny Jenkins
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) 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> <p>However, I would like to emphasise a few of the most important points within that response that I strongly agree with:</p> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an

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Include files	
Number	Question 11
ID	LPIO10751
Full Name	Taylor Wimpy Strategic Land
Company / Organisation	Taylor Wimpy Strategic Land
Position	C/O Pegasus Group
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The approach to the selection of sites has not been clearly defined; whilst the Issues and Options paper explores issues relating to site selection, there is no stated approach as to how sites will be selected.</p> <p>That being said, we welcome the recognition at paragraph 5.4.3 that a variety of sites should be provided over the Plan period. The Council has clearly understood the opportunities to provide flexibility across a range of sites and locations. However, this needs to be encapsulated within a formalised approach to the selection of sites. Furthermore the Council should clarify which locations are to be prioritised for the allocation of sites; we consider this should include a range of</p>

	sustainable locations including the towns and larger villages. For full response please see question 46.
Include files	
Number	Question 11
ID	LPIO10796
Full Name	Grant Imlah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>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.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green

	<p>Belt sites that can deliver in the early years of the plan period (including the first five years!).</p> <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO10838
Full Name	Mrs Julie Cummings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The use of brownfield areas in the area should be prioritised (including ensuring current domestic and commercial properties are fully utilised) as should further expansion of the larger settlements where sustainable growth is more manageable and less detrimental to the green spaces and wildlife.
Include files	
Number	Question 11
ID	LPIO10849
Full Name	Sheila Dawkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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.

Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town

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Question 11 *Do you agree with the proposed approach to selecting sites?*

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 - Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper.

Number	Question 11
ID	LPIO10898
Full Name	Jean 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>Site selection is heavily influenced by sites available from developers and other interested parties and to that extent is unfairly biased towards those sites. In my view this introduces a 'conflict of interest' between developers and planners. How can Planners take an independent view in this situation.</p> <p>The plan also disregards the development of new homes through planning for larger scale developments together with the supporting infrastructure such as schools, shops etc. This option has previously disregarded by the Council as there being "limited opportunities" for stand alone new settlements. However I feel that Hemel Hempstead could be developed with modular self contained new communities/villages as an extension to the principals of the original new town plans. This type approach can be seen in Milton Keynes for example. It has all the infrastructure necessary to support such development.</p>
Include files	
Number	Question 11
ID	LPIO10947
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town</p>

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

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Include files	
Number	Question 11
ID	LPIO10997
Full Name	Mrs Patti Whittle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

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.

Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG response to Question 11 (please note full document is attached to Q46)

Do you agree with the proposed approach to selecting sites?

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
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Include files

Number	Question 11
ID	LPIO11044
Full Name	J M 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>Site selection is heavily influenced by sites available from developers and other interested parties and to that extent is unfairly biased towards those sites. In my view this introduces a 'conflict of interest' between developers and planners. How can Planners take an independent view in this situation.</p> <p>The plan also disregards the development of new homes through planning for larger scale developments together with the supporting infrastructure such as schools, shops etc. This option has previously disregarded by the Council as there being "limited opportunities" for stand alone new settlements. However I feel that Hemel Hempstead could be developed with modular self contained new communities/villages as an extension to the principals of the original new town plans. This type approach can be seen in Milton Keynes for example. It has all the infrastructure necessary to support such development.</p>
Include files	
Number	Question 11
ID	LPIO11125
Full Name	Cally Emmas
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"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.

	<ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO11172
Full Name	Mr Neil Aitchison
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	a rigorous analysis is needed on a top down bottom up approach on a proper numerical scored basis on more detailed criteria. This has not been properly addressed.This is a paste up of the Call for Sites.
Include files	
Number	Question 11
ID	LPIO11218
Full Name	Jon Rollit
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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.

Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
 - Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on
 - This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
 - 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
 - The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market
 - Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.

Include files

Number	Question 11
ID	LPIO11269
Full Name	Kate Locke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>In addition I would reiterate the extensive points made in the BRAG response to the 'Issues & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • Inclusion of higher density developments in appropriate areas of Hemel is not addressed in any detail in the proposed approach. More

	<p>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</p> <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO11326
Full Name	David Greenwood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Infrastructure enhancement needs to happen concurrently with housing development not after the event. Therefore, as no infrastructure improvements are proposed in and around Bovingdon, no new housing estates should be built.
Include files	
Number	Question 11
ID	LPIO11334
Full Name	Mrs Elizabeth Debenham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There are empty offices which could be converted into flats before encroaching on green areas much needed for community amenities. More people are taking to working from home rather than travelling in to work facilitating less need for office space.
Include files	
Number	Question 11
ID	LPIO11357
Full Name	Ms Lorraine Gilmore

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>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.</p> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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

	<p>areas will reduce the pressure on Green Belt but only if it is considered fully before the easy option of Green Belt</p> <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LP1011406
Full Name	Conian
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 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 & 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>Q11. NO</p> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town, which could be sustainably built from the bottom up and planned to be fit for purpose</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p><i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a

	<p>period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large sites of 3000+ offer best opportunity to provide the necessary additional</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO11479
Full Name	Mr Alan Ledger
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 large scale development proposed by the Council:-</p> <ul style="list-style-type: none"> • is far too big for the size of Berkhamsted and the services we enjoy; • would put further unacceptable strain on already overloaded infrastructure; • greatly exceeds the needs of our community; • would result in an unacceptable spread of urban built environment currently restricted for good reason by the Green Belt; • would adversely affect the character of our historic market town; and <p>ignores other areas e.g. Hemel Hempstead that are more appropriate for high density development.</p>

Include files	
Number	Question 11
ID	LPIO11516
Full Name	Ms Eliza Hermann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The proposed approach to selecting sites places too much emphasis on development of Green Belt sites. Development must instead be focussed on brownfield sites and urban regeneration. There is considerable potential for this at Hemel Hempstead and throughout the entire borough. At 5.4.10 the consultation document states "Our priority will be to maximise the use of brownfield sites. Government expects us to demonstrate that we have fully explored such sites before Green Belt sites are considered" but the borough has yet to compile a brownfield land register, or if it has I cannot find it. I believe there are ample brownfield sites to continue meeting housing need for many years to come, especially but not only in Hemel Hempstead.
Include files	
Number	Question 11
ID	LPIO11566
Full Name	Ms Anna Barnard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The National Planning Policy Framework (NPPF) has a general presumption against development in the Green Belt except for exceptional circumstances. Dacorum appears to be disregarding this and taking the perverse view that it is acceptable to allow vast areas of the Green Belt land to be used for development – either directly for housing or for the required infrastructure. No exceptional circumstances have been proved and therefore no further land should be taken out of the Green Belt. Neither has it proved that there are no alternatives to building on the Green Belt eg. brownfield sites or higher density within the towns
Include files	
Number	Question 11
ID	LPIO11595

Full Name	Janet and James Honour
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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

	<ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White Paper
Include files	
Number	Question 11
ID	LPIO11750
Full Name	Edmund Holey
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>Brag Response to question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be

	<p>accompanied also by an assessment of their impact on</p> <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market <p>Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper</p>
Include files	
Number	Question 11
ID	LPIO11801
Full Name	John Thomson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As I understand it, your housing development policy, which I support, is inter alia to (a) limit the impact on the countryside, (b) use brownfield sites, (c) make sure roads cope, (d) and provide suitable levels of infrastructure. Regretfully and in general terms, I'm afraid I do not believe your draft plan addresses these sufficiently. In particular, I do not think the capability of extra housing from existing developed sites and non-Green Belt has been fully explored
Include files	
Number	Question 11
ID	LPIO11851
Full Name	SHEILA SHELDRAKE
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	One solution to the housing problem would be to convert some of the empty offices, shops and factories to housing. This would mean that the shops that remained would be able to make more profit and the residents could walk, or cycle to the remaining shops. Safeguards could be in place to ensure that there is a good variety of shops remaining. Most of the jobs are within the towns and more cycle tracks and footpaths should be provided to minimise traffic congestion and also obesity.
Include files	
Number	Question 11
ID	LPIO11858
Full Name	Councillor Alan Anderson
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 wholly inappropriate and reveals a determination to develop the Green Belt if one excludes sites that are at an advanced stage in the planning process or have been completed - the plan period is already in force, and this needlessly puts more pressure on the Green Belt.
Include files	
Number	Question 11
ID	LPIO11900
Full Name	Janet Mason
Company / Organisation	Berkhamsted Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Policy CS1 of the Core Strategy states that</p> <p>“Any new development should:</p> <ul style="list-style-type: none"> • be based on the neighbourhood concept; • provide for its own infrastructure; and • support relevant town wide ” <p>This policy also states:</p> <p>“The market towns and large villages will accommodate new development for housing,</p>

employment and other uses, provided that it:

- 1 is of scale commensurate with the size of the settlement and the range of local services and facilities;
- 1 helps maintain the vitality and viability of the settlement and the surrounding countryside;
 - 1 causes no damage to the existing character of the settlement or its surrounding countryside; and
 - 1 is compatible with policies protecting the Green Belt and Rural ”

Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted and Northchurch (1180 for 2006 – 2031) could not be sustained on infrastructure grounds. The market towns and large villages were identified as Areas of Limited Opportunity. In Table 1: Settlement Hierarchy of Core Strategy it is stated that “The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of

growth is required to support local community needs.”

Significant Green Belt release on the edge of the Berkhamsted and Northchurch settlement will clearly breach these policy assurances.

We note again the Inspector’s Report to Dacorum Borough Council [July 2013, Q9 for the reference no.] which states, with reference to market towns, “...However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.” para 39]

It is illogical to exclude large sites in excess of 3000. Large sites of 3000 or more should be included in the assessment as they provide the best opportunity to provide the necessary additional infrastructure.

The current household build rate per annum in Berkhamsted and Northchurch is significantly above target, indeed at the current rate most of the estimated target capacity (1180) will be deployed by 2020 – that is 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing the allocation of development numbers across the Borough and site options.

	<p>The cumulative impact of small scale developments, including windfall, on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. For example the construction of 100 dwellings as windfall over a number of years leads to the same infrastructure burden as an allocated site of 100. An assessment of the infrastructure requirements arising from a steady accumulation of “small sites” is needed, with a view to estimating future needs.</p> <p>We support the maximisation of brownfield sites for development. However, their use should be accompanied by an assessment of their impact on infrastructure.</p> <p>Gardens are “Greenfield” sites and development should be discouraged as indicated in the Government white paper.</p> <p>We strongly support development of brownfield sites before Green Belt sites are considered. However, this objective is contradicted and compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years).</p> <p>The inclusion of higher density developments in appropriate areas of Hemel Hempstead is not addressed in any detail in the proposed approach. More emphasis on e.g. taller buildings in appropriate areas will enable higher urban capacities and reduce pressure on the Green Belt.</p>
Include files	
Number	Question 11
ID	LPIO11947
Full Name	Dee Sells
Company / Organisation	Markyate Parish Council
Position	Parish Clerk/ RFO
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>No</p> <p><i>Markyate Parish Council has already commented on sites under Question 6:</i></p> <p><i>‘There needs to be an acknowledgement that Dacorum is providing homes for many who do not work in the area, but commute, mainly into London; homes for these workers need to be located close to a transport hub, station, underground or bus, such that they can walk or cycle to that hub for their onward journey.</i></p>

Employment opportunities in rural areas, even bigger villages like Markyate are very limited, and bus services are inadequate to serve the needs of anyone working outside the village. Thus all housing in rural areas needs to be to be designed only to meet local needs.'

Thus while Markyate Parish Council does not have the knowledge to comment on locations outside the rural ones, we believe that all development, save that to meet local needs should be in the urban areas, with much located close to transport hubs to meet the needs of commuters into London.

The Parish Council have not consulted with the landowner, but do see a small development of affordable housing, preferably Council housing to be really affordable, at the approach to the village along Buckwood Road from Studham. A wide road off on the left immediately before the first houses leading to a large turning/drop-off area before the Village School would stop the school traffic from passing through the housing estate and give access to coaches and other large vehicles visiting the school. We would envisage the housing to be on the left of the road. The right side of the road could be used to provide access or safe parking for the houses off Cowper Road, economics might call for more houses too, but only for local use, and affordable.

The Core Strategy did seek to provide a new Care/Nursing Home for Markyate. Caddington Hall is in our Parish and has recently been closed by Mid Bedfordshire Council and the site has been sold on. This could provide an excellent brown field site for a new Care Home for Markyate. The old Caddington Hall provided pleasant, peaceful rural accommodation for residents who had no need to travel daily, as well as local jobs. It would not be an appropriate site for general housing as it is outside the village core and unsuitable for accessing work without a car.

Include files	
Number	Question 11
ID	LPIO11991
Full Name	Mark Behrendt
Company / Organisation	Home Builders Federation
Position	Planning Manager – Local Plans
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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

	<p>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>
Include files	
Number	Question 11
ID	LP1012047
Full Name	David Wilyman
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>Standard BRAG response to Question 11. Please note full document is attached to Question 46</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater

	<p>amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO12100
Full Name	Colin Blundel
Company / Organisation	Chiltern Society
Position	Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	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.

	We support the proposed hierarchy and particularly the proposal to maximise the use of brownfield sites ahead of greenfield sites.
Include files	
Number	Question 11
ID	LPIO12138
Full Name	Ray 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>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> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>Standard BRAG response to Question 11. Please note full document is attached to Q46.</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green

	<p>Belt sites that can deliver in the early years of the plan period (including the first five years!).</p> <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO12203
Full Name	Douglas & Christina Billington
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an

	<p>opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO12282
Full Name	Richard Frankel
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years</p>

should not be ignored – including the possibility of a properly planned new Garden Town.

Standard BRAG response to Question 11. Please note full document is attached to Question 46.

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
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 - The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market
 - Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.

Include files	
Number	Question 11
ID	LPIO12340
Full Name	Mr Brian Kazer
Company / Organisation	Tring in Transition
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>Opportunity at two Tring existing sites for sheltered housing and additional residential home. First is north of Western Road (this site being very short walk to Tring's health centre, a pharmacy, and some local shops), and Akeman Street (short walk to post office, and small supermarket etc).</p> <p>In Tring, Tr-h5 should be developed first to comply with NPPF requirement of presumption in favour of sustainable development. The other Tring proposed sites will significantly increase car dependency as compared with Tr-h5 as they are significantly further from the town centre, and too far for walking to be a realistic option.</p> <p>Tr-h6 was assessed by the Arup Report "Green Belt Review and Landscape Appraisal Stage 2 January 2016" as <i>"it is also almost completely constrained by AONB and has a number of other non-absolute constraints which, although don't preclude development, make it less preferential. Exclude from further assessment and retain as Green Belt"</i>. We would thus recommend Tr-h6 be removed from this Local Plan.</p>
Include files	
Number	Question 11
ID	LPIO12345
Full Name	ms rona morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Stating that large scale (3000 + dwellings) would put substantial pressure on the local infrastructure is of great significance. The plan clearly ignores the cumulative impact of multiple smaller developments. Looking at Berkhamsted as an example it has overdelivered on its local planned build rate (>30% ahead) and suffers from a lack of parking, awful traffic jams at peak times, and a poor water supply when it gets mildly warm (numerous demand related interruptions this summer). The reward appears to be to get lumbered with even more. The emphasis may well need to be more radical with new towns and higher density housing where appropriate but the plan seems to have excluded the difficult decisions before heading out for consultation.</p>
Include files	
Number	Question 11

ID	LPIO12426
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town. Q12. Transport issues. Berkhamsted is a linear/valley Market Town with narrow streets. Options are limited.</p> <p>Standard BRAG response to Question 11. Please note full document is attached to Question 46.</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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

	<p>areas will reduce the pressure on Green Belt but only if it is considered fully before the easy option of Green Belt</p> <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LP1012474
Full Name	Meenakshi Jefferys
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.

	<ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White Paper.
Include files	
Number	Question 11
ID	LPIO12521
Full Name	Mrs Jane Barrett
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>Standard BRAG response for Question 11. Please note full document is attached to Question 46.</p>

	<p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO12570
Full Name	mr paul healy
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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.

Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
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 - 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
 - The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market
 - Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.

Include files

Number	Question 11
ID	LPIO12620
Full Name	Merrick Marshall
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) have 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 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel(the hospital site for one). Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • Inclusion of higher density developments in appropriate areas of Hemel is not addressed

	<p>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</p> <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LP1012669
Full Name	Monika & Casper Gibilaro
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 & 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</p> <p>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green

	<p>Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure.</p> <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White Paper.
Include files	
Number	Question 11
ID	LPIO12717
Full Name	Lorna Ginn
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 new Local Plan</p> <p>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> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p>

	<ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO12766
Full Name	Mr Raymond Phipps
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 wish to comment as follows to the Strategic Options Consultations. In general I follow the comments made by BRAG.</p> <p>...</p>

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure
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 - The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns.
 - Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.

Include files	
Number	Question 11
ID	LPIO12813
Full Name	Ingrid Carola McKenna
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

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.

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

Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

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Include files	
Number	Question 11
ID	LPIO12861
Full Name	Mr Stephen Lally
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.</p> <p>...</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be

	<p>assessed especially in our market Towns.</p> <ul style="list-style-type: none"> Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White Paper.
Include files	
Number	Question 11
ID	LPIO12911
Full Name	Jon Whittle
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> This objective is consistently contradicted/compromised by giving extra credibility and weight to Green

	<p>Belt sites that can deliver in the early years of the plan period (including the first five years!).</p> <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO12964
Full Name	Edward Keane
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There

	<p>is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market Towns. • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO13013
Full Name	Bettina Deuse
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years</p>

should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG response to question 11 below (full BRAG response see question 46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
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 - The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market
 - Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper

Include files	
Number	Question 11
ID	LPIO13066
Full Name	Mr Paul Tinworth
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 wish to express my full agreement with the response from the Berkhamsted Residents Action Group regarding Dacorum's Local Plan.</p> <p>...</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White Paper.
Include files	
Number	Question 11
ID	LPIO13114
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>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> <p>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be

	<p>assessed especially in our market towns.</p> <ul style="list-style-type: none"> Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White Paper.
Include files	
Number	Question 11
ID	LPIO13162
Full Name	Mr J P Goodings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No Choose areas not disruptive to existing residents.
Include files	
Number	Question 11
ID	LPIO13180
Full Name	Mr J G Botha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt and rural areas should be protected. Why should we in Dacorum have to take the hit on housing shortages when there can be houses built up north or new towns built away from the south east. It's a big country. Why not reinvigorate other parts of the country where land is cheaper? Once greenbelt is gone it is gone forever.
Include files	
Number	Question 11
ID	LPIO13215
Full Name	Mrs Suzanne Gray
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	In tring I do not think there are any more brown field sites but there does seem to be many back gardens having small developments.
Include files	
Number	Question 11
ID	LPIO13258
Full Name	D. Phillips
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 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.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should be ignored - including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure

	<ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO13331
Full Name	Janet Fanshawe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Our principal objection to this plan stems from our belief that the Green Belt should be protected, particularly where there is a danger that any building on 'greenfield sites' would lead to a coalescing of communities, leading to urban sprawl. The Government had recently emphasised the need to use brownfield sites and is apparently setting aside money for this purpose.
Include files	
Number	Question 11
ID	LPIO13336
Full Name	Mr Keith Fanshawe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Our principal objection to this plan stems from our belief that the Green Belt should be protected, particularly where there is a danger that any building on 'greenfield sites' would lead to a coalescing of communities, leading

	to urban sprawl. The Government had recently emphasised the need to use brownfield sites and is apparently setting aside money for this purpose.
Include files	
Number	Question 11
ID	LPIO13368
Full Name	Mrs Christine Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Once you destroy green belt it cannot be replaced. I do not agree that Green Belt or rural land should be part of the overall plan.
Include files	
Number	Question 11
ID	LPIO13369
Full Name	Mr Alan Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Once you destroy green belt it cannot be replaced. I do not agree that Green Belt or rural land should be part of the overall plan.
Include files	
Number	Question 11
ID	LPIO13448
Full Name	Mrs Catherine Imber
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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, we request you accept this as

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

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

Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
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 - 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
 - The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market
 - Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.

Include files	
Number	Question 11

ID	LPIO13496
Full Name	Deborah Smith
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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

	<ul style="list-style-type: none"> The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO13534
Full Name	John Rush
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I have read the documents on the Dacorum Borough Website relating to the call for sites for potential development for housing. I also visited the exhibition at the Berkhamsted Civic Centre on 17th November and talked with some of the Dacorum staff present. I recognise that the present position is far from finalised and that the possible sites offered for housing are from self-serving land owners and developers. I further recognise the difficulties and pressures caused by the demand for housing but wish to place on record my strenuous objections to the use of Green Belt land to satisfy this demand without the utmost use being made of all brown field sites within the borough.
Include files	
Number	Question 11
ID	LPIO13536
Full Name	John Rush
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	While I appreciate the need for housing I am very concerned at the taking of Green Belt Land. This in turn affects the ANOB which surrounds the whole area. The field in Ivy House Lane is viable farmland, and has been producing substantial cereal crops in every year since my wife and I moved to Hunters Park in 2006 and for many years before. I feel that housing need should be better satisfied by use of brown field sites and was disturbed to discover that a register of brown field sites

	in the borough will only be produced in December. Additionally developers holding land should be required to build on the sites already approved before more Green Belt land is taken – never to be replaced.
Include files	
Number	Question 11
ID	LPIO13551
Full Name	Mr Alan O'Neill
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early

	<p>years of the plan period (including the first five years!).</p> <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO13604
Full Name	Sue O'Neill
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a

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Include files	
Number	Question 11
ID	LPIO13666
Full Name	Tim Uden
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) 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 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years</p>

should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
 - Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on
 - This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
 - 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
 - The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market
 - Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.

Include files	
Number	Question 11
ID	LPIO13731
Full Name	Edward Hatley
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel Hempstead. Sites capable of very large scale development over a number of years should not be ignored – including the possibility of a properly planned new “Garden” Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.

Include files	
Number	Question 11
ID	LPIO13780
Full Name	Mr Roger Didham
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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

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Include files	
Number	Question 11
ID	LPIO13836
Full Name	Alex 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>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> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site

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Include files	
Number	Question 11
ID	LPIO13917
Full Name	Mr Chris Stoneman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We therefore wish to state that more use should be made of Brownfield Sites in this plan rather than Green Belt and for Dacorum there are still many opportunities in Hemel Hempstead.
Include files	
Number	Question 11
ID	LPIO13922
Full Name	David and Katie Hannah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Question 11 Do you agree with the proposed approach to selecting sites? No. With regard to Be-H3, I fail to see how a site that has been ruled out by Dacorum planners on multiple occasions due to fundamental topographical and infrastructural weakness can now have advanced this far in the process. No fundamental factors have changed, yet time and resources are wasted yet again on all sides in having to highlight this to DBC.
Include files	
Number	Question 11
ID	LPIO13926
Full Name	Cynthia Longbottom
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Having been to the exhibition at Berkhamsted Civic Centre and read the documents relating to the call for sites for potential development for housing I wish to object to the use of Green Belt land to cope with the demand before ensuring that brown field sites are fully utilised
Include files	
Number	Question 11
ID	LPIO13955
Full Name	Nigel Hewitt
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt is there for a reason!!! We cannot build on it!! There is plenty of Brown sites that can be developed, this must happen first.
Include files	
Number	Question 11
ID	LPIO13968
Full Name	Dr Philip Rutter
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Finally, I think it is worth recalling the Government's own position expounded in the 2017 autumn budget. The statement was clear: Green Belt land should be protected from exploitation for housing. Rather, housing needs should be met by expanding provision within urban environments: ' <i>... introducing planning reforms that will ensure more land is available for housing, and that maximises the potential in cities and towns for new homes while protecting the Green Belt.</i> ' (p.3) The reasons for this are clearly set out in Chapter 5 of the Government's Budget Report.
Include files	
Number	Question 11
ID	LPIO13993
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Building on our Green Belt should not be an option with so many other sites better suited (e.g. brownfield) and readily available.
Include files	
Number	Question 11
ID	LPIO14006
Full Name	Danny Jennings
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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. ... BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

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 - 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
 - The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns.
 - Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White Paper.

Include files	
Number	Question 11
ID	LPIO14055
Full Name	Mr John Goffey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

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 *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 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.
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Include files

Number

Question 11

ID

LPIO14103

Full Name	Sue Elleray
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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.

	<ul style="list-style-type: none"> The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO14154
Full Name	Mr Richard White
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 disagree with the Dacorum Local Plan proposals for the reasons stated in the BRAG response</p> <p>...</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. <ul style="list-style-type: none"> Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).

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Include files	
Number	Question 11
ID	LPIO14295
Full Name	Ms Vicky Tattle
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over an numbers of years should not be ignored –including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing

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Include files	
Number	Question 11
ID	LPIO14344
Full Name	Mrs J M Sparks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The DBC Green Belt Plan is flawed. Any adjustments in Green Belt should have been completed before considering planned new sites. The consultants/DBC have ignored current policy to protect green Belt. Even accepting some requirements may need adjustment, the scale indicated in your plans ignores both intentions and policy to protect Green Belt. Brown Field sites must have priority. DBC has, in fairness, has utilised this option in Hemel Hempstead. There remain further sites that can be developed.
Include files	
Number	Question 11
ID	LPIO14371

Full Name	Peter Hall
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Would it not be preferable to keep these green belt sites as green belt and to consider brownfield sites or even Bovingdon aerodrome?
Include files	
Number	Question 11
ID	LPIO14384
Full Name	Ray Tattle
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) 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> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored –including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an

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Include files	
Number	Question 11
ID	LPIO14432
Full Name	Giselle Okin
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) 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> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the

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Include files	
Number	Question 11
ID	LPIO14481
Full Name	Mr David Griffin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<i>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.</i>

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

Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of

very large scale development over a numbers of years should not be ignored – including the possibility of a properly

planned new Garden Town.

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Include files

Number

Question 11

ID	LPIO14523
Full Name	Edith Howell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites should be used <u>NOT</u> Green Belt land
Include files	
Number	Question 11
ID	LPIO14556
Full Name	Debbi James-Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We should be developing on <u>brown</u> fields sites and using empty homes across Hertfordshire
Include files	
Number	Question 11
ID	LPIO14564
Full Name	E. Dodwell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Redevelop brown sites in city centres for residential use
Include files	
Number	Question 11
ID	LPIO14567
Full Name	R. Nicholls
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	When all brownfield sites, like those on HH business park, then think again.
Include files	
Number	Question 11
ID	LPIO14581
Full Name	Bethan Tossell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Kings Langley is already a heavily saturated area + more effort should be made to fill empty houses in less popular areas to boost those towns rather than destroying 'easier areas'
Include files	
Number	Question 11
ID	LPIO14591
Full Name	Mrs M. Butcher
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites to be used first please
Include files	
Number	Question 11
ID	LPIO14599
Full Name	Lewis Chamberlain
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Should be investing money in filling houses in areas that are not being lived in or need work on them for people to live in them.
Include files	

Number	Question 11
ID	LPIO14616
Full Name	Mrs D. Hines
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Use empty houses in the area BEFORE you build new ones!
Include files	
Number	Question 11
ID	LPIO14618
Full Name	Adele Herring
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We need to keep the green belt areas and build on the brownfield sites instead.
Include files	
Number	Question 11
ID	LPIO14620
Full Name	Brian Evans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There are adequate brownfield sites that <u>need</u> to be revitalised
Include files	
Number	Question 11
ID	LPIO14625
Full Name	dr kim goode
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The need for these houses is unclear. I would not object to sustainable eco housing but not on the greenbelt. Please use brownfield sites.
Include files	
Number	Question 11
ID	LPIO14636
Full Name	Mr M. Sheldrake
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Future development should be restricted to <u>brownfield</u> sites and not green belt sites Any future development should avoid coalescence between Kings Langley / Hemel Hempstead + neighbouring towns this is not fully recognised in some options.
Include files	
Number	Question 11
ID	LPIO14647
Full Name	SHEILA SHELDRAKE
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Houses should be built around the 3 major towns, where the jobs are. Cycle tracks and footpaths can be improved to minimise car use.
Include files	
Number	Question 11
ID	LPIO14649
Full Name	Alex Ashman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We should be building on brownfield, not greenfield sites
Include files	
Number	Question 11
ID	LPIO14653
Full Name	Mrs Patricia Hansard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt sites should never have housing on them, only brownfield.
Include files	
Number	Question 11
ID	LPIO14656
Full Name	Mr D. Hansard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites only should be used
Include files	

Number	Question 11
ID	LPIO14679
Full Name	Ann Bunn
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 11
ID	LPIO14697
Full Name	Edith Howell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites should be used instead of building on GREEN BELT
Include files	
Number	Question 11
ID	LPIO14700
Full Name	Mr Howell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The development of brownfield sites is to be encourages.
Include files	
Number	Question 11
ID	LPIO14707
Full Name	mr ron perkins
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 11
ID	LPIO14758
Full Name	Ms Paula Farnham
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 (or will be) responded (ing) in full to the 'Issues & 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.</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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early

	<p>years of the plan period (including the first five years!).</p> <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO14806
Full Name	Steve Baker
Company / Organisation	CPRE - The Hertfordshire Society
Position	Planning Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The overriding emphasis in the consultation is on the development of greenfield sites in the Green Belt to meet one of the growth options. Paragraph 5.4.13 states that “brownfield sites are a finite resource” and that the Council will need to rely more on greenfield opportunities in the future”. Green field sites are also a finite resource. Once developed green fields are lost forever whereas brownfield sites can be developed and re-developed in the future.</p> <p>In addition, simply adding sites to a brownfield register is not an active way of considering options for housing development. Only one brownfield regeneration site, in Hemel Hempstead, is mentioned in the consultation document. Although on page 35 there is a link to a ‘Call for Sites’ form, CPRE Herts encourages the Council to promote this call for brownfield sites as fully as possible.</p>
Include files	
Number	Question 11
ID	LPIO14829
Full Name	Bev Mckenna
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 & 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.</p> <p>In addition, I draw attention to some of the most important points within that response</p> <p>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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

	<ul style="list-style-type: none"> The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White Paper.
Include files	
Number	Question 11
ID	LPIO14876
Full Name	Mr Michael Curry
Company / Organisation	Tring Town Council
Position	Town Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>There is concern that the process of identifying sites is skewed towards the most aggressive developers who are purely profit motivated. Effort should be made to secure sites which would be most beneficial to the settlement/surrounding area in light of the various strategies and visions – sites which have not been forthcoming during the ‘call-for-sites’ exercise.</p> <p>Paraphrasing: have a vision and look for the sites to fulfil it; not make the best of what you get.</p>
Include files	
Number	Question 11
ID	LPIO14931
Full Name	Malcolm and Jill Allen
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) 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.</p> <p>However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.</p>

Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town. **Some residential use could be made of the Industrial Estate which has access to the A41.**

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional
 - Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on
 - This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
 - 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
 - The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market
 - Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.

Include files	
Number	Question 11
ID	LPIO14981
Full Name	Mr Clive Freestone

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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on <ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on

	<p>infrastructure requirements cannot be underestimated and should be assessed especially in our market</p> <ul style="list-style-type: none"> Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO15031
Full Name	Mr & Mrs D A Simmons
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 & 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, <i>in particular our response to Q25.</i></p> <p>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional <ul style="list-style-type: none"> Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on

	<ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO15089
Full Name	Tom Simmons
Company / Organisation	St William Homes LLP
Position	Development Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	However, as previously set out, it is considered that further measures to optimise brownfield sites, including through increased densities and a relaxation of car parking requirements in sustainable locations, should be introduced. This would ensure greater consistency with the National Planning Policy Framework with regards to the effective reuse of previously developed land.
Include files	
Number	Question 11
ID	LPIO15159
Full Name	Ms Tracy Puttock
Company / Organisation	Ashill Land Ltd
Position	Planning Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	<p><i>Question 11 – Do you agree with the proposed approach to selecting sites?</i></p> <p>We support the Council's approach to maximise the use of brownfield sites which is one of the Core Principles set out in the NPPF (paragraph 17) and the fact that development of brownfield land represents a common starting point for all of the Council's growth options. On this basis, we are of the view that the Council should look to fully explore housing delivery from such sites and so in order to do this we consider that sites with a capacity of 10+ dwellings and/or a minimum of 0.3Ha should be allocated within the emerging Local Plan, in accordance with the approach set out in paragraph 5.4.2.</p>
Include files	
Number	Question 11
ID	LPIO15243
Full Name	Garry Pearson
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 use of brownfield areas in the area should be prioritised (including ensuring current domestic and commercial properties are fully utilised) as should further expansion of the larger settlements where sustainable growth is more manageable and less detrimental to the green spaces and wildlife.</p>
Include files	
Number	Question 11
ID	LPIO15258
Full Name	Caroline Manson
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 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>

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.

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11: *Do you agree with the proposed approach to selecting sites?*

No

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.
- Strongly support maximisation of development of brown field sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure.
- This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
- 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.
- The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns.
- Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.

Include files	
Number	Question 11
ID	LPIO15310
Full Name	Mr Alan Conway
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 already responded to the Issues & Options Consultation. I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p>Q11 Support the BRAG submission. Again common sense suggests that brown field sites must have priority.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LP1015359

Full Name	Sue Wolstenholme
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 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>Standard BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	

Number	Question 11
ID	LPIO15400
Full Name	Paul de Hoest
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<ol style="list-style-type: none"> 1 There are many empty homes in the UK (up to 1.4m according to some estimates, many of which are in London, owned by absentee overseas investors). We also know that there are many areas where planning has been granted and yet developers have not built – the Chancellor of the Exchequer raised this issue in the recent budget. Policy needs to be geared to addressing these issues before accelerating new build. 2 In the context of a Government imposed range of targets, since there is little evidence that the population growth projections are anything other than arbitrary then the right level to project would be the lowest figure possible. In this case that equates to 13,800 (which is already 40% higher than the current Core Strategy). There is no case for projecting a higher figure (ie DBC proposal for 17,400) 3 There is a great deal of evidence that there are many underutilised brownfield sites which must be developed before touching any more Green Belt. It would be helpful to ensure that all brownfield has been identified. In any case, as stated above, there is no case for further encroachment of Green Belt for the reason that there is no established demand for the necessary housing development. 4 The choice for the council should be the minimum it can possibly get past the Secretary of State and it should focus only on existing brownfield sites (where infrastructure exists) and plan for a future with far less private traffic (this will be a reality in a few short decades) and it should consider the local social fabric/economies in their entirety rather than seek piecemeal solutions.
Include files	
Number	Question 11
ID	LPIO15421
Full Name	Nick Hanling
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a number of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns

	<ul style="list-style-type: none"> Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO15469
Full Name	Sarah and Nigel Tester
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 & 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure

	<ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO15525
Full Name	Miss Tanya Assarat
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 & 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>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site

	<p>of 3000+ offer best opportunity to provide the necessary additional infrastructure</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO15574
Full Name	Melanie Llewellyn
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 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>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester

	<p>where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO15641
Full Name	Mr James Honour
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 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>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the

	<p>plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO15678
Full Name	Mrs E. Nicholls
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I object to the proposed development on the Green Belt in around Kings Langley because: until all brownfield sites in Dacorum are built on, <u>NO</u> greenfield sites should be built on, or even considered.
Include files	
Number	Question 11
ID	LPIO15679
Full Name	James and Rosemary Good

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It would be reassuring if a serious commitment was made to carefully consider the not insignificant number (admittedly some quite small) of 'brown field' sites available within the DBC area.
Include files	
Number	Question 11
ID	LPIO15700
Full Name	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>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.</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are "A) <i>Achievable or B) Suitable and C) Achievable</i>" does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock</p>

	<p>land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO15748
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	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...

GFRA Response to Question 11, full document attached to question 46

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are "A) Achievable or B) Suitable and C) Achievable" does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA "C) Achievable" is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

	At Paragraph 5.4.12 the Council states the following “however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.
Include files	
Number	Question 11
ID	LPIO15795
Full Name	David Kerrigan
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 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>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can

	<p>deliver in the early years of the plan period (including the first five years!).</p> <ul style="list-style-type: none"> • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO15835
Full Name	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>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.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO15863
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

<p>Your response - Please add your response here</p>	<ul style="list-style-type: none"> • DBLP wishes to make the following observations on the site selection process • In terms of the general approach of the plan to discount sites of under 10 dwellings from being allocated, this is a sensible proposition, reflecting practice elsewhere. However, there is a clear requirement under paragraph 157 of the Framework for local plans to allocate sites. Should the Plan be reliant upon strategic development sites for delivering the bulk of its housing requirement, a realistic assessment has to be made about their deliverability in Framework terms. This is to ensure that any potential shortfalls are adequately addressed through sufficient allocations being made in the intervening periods. The Plan cannot have a strategy where there is reliance on very large strategic allocations, delivering the bulk of the OAN and no provision for intermediate supply between the time it takes for the larger allocations to be consented and commence actual delivery of housing land. • The “priority” given to the development of brownfield land should not be conflated with any potential sequential approach. Paragraph 17 of the framework makes it clear that the requirement is to “encourage” which does not mean give “priority” to brownfield land over green field sites
<p>Include files</p>	
<p>Number</p>	<p>Question 11</p>
<p>ID</p>	<p>LPIO15898</p>
<p>Full Name</p>	<p>Mrs Sue Yeomans</p>
<p>Company / Organisation</p>	<p>Chilterns Countryside Group</p>
<p>Position</p>	<p>Chairman</p>
<p>Agent Name</p>	
<p>Company / Organisation</p>	
<p>Position</p>	
<p>Your Opinion - Please state your opinion here</p>	<p>No</p>
<p>Your response - Please add your response here</p>	<p>1 <u>2. GREEN BELT</u></p> <p>2.i. The fundamental aim of Green Belt policy remains to contain urban sprawl by keeping land permanently open; essential characteristics of Green Belts are their openness and permanence. The CCG regrets that the LP seeks to challenge and change Green Belt status in the Borough, and importantly, for the setting of the Chilterns AONB.</p> <p>2.ii. Paragraph 80 of the National Planning Policy Framework (NPPF) sets out the 5 main purposes of the Green Belt which are: _</p> <ul style="list-style-type: none"> • <i>to check the unrestricted sprawl of large built-up areas</i> • <i>to prevent neighbouring towns from merging into one another</i>

- *to assist in safeguarding the countryside from encroachment*
- *to preserve the setting and special character of historic towns*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

2.iii. Clearly, the Green Belt in the Borough, particularly that around Tring and Berkhamsted, currently fulfils those functions. The CCG finds no justifiable cause for those essential functions to be considered unnecessary or potentially replaceable by the development of Suitable Alternative Natural Greenspaces (SANGs).

2.iv. The NPPF has a general presumption against development in Green Belt unless this meets the very special circumstances described in paragraphs 89 and 90. Clearly, the options of the LP do not do so. Therefore the CCG does not agree with release of current Green Belt land for housing unless and until such exceptional circumstances are met.

2.v. The NPPF does allow for review of Green Belt boundaries through preparation of a Local Plan (paragraph 83) and in the exceptional circumstances described in paragraph 85. Land which is used as open space, sport and recreation is protected by the NPPF. Green Belt sites particularly on the Eastern edge of Tring support all these activities, with good public access for walking, fishing on the Grand Union Canal, riding, running and cycling, together with valuable agricultural land. Public access such as that given by Marshcroft Lane, Tring, affords a good quality outdoor experience to people with limited physical mobility.

2.vi. All residents are aware of the widespread use of cycle routes, lanes and off-road paths by visitors, particularly ramblers and cyclists, to the area. Ease of access by road and rail from London and its suburbs makes the Chilterns a popular tourist destination which is healthy for participants and supports the local economy. The large scale housing options of the LP will diminish this experience and impact negatively upon both the local and visiting communities.

2.vii. Consistent with the NPPF objectives to enhance beneficial use of the Green Belt, paragraph 81 states that once Green Belts have been defined (which they already are), Councils should plan positively to achieve this aim by providing opportunities for outdoor sport and recreation (see pt 2.iv.); retaining and enhancing landscapes, visual amenity and biodiversity; or improving damaged and derelict land. The CCG finds limited opportunities within the LP for DBC to support these aims; indeed the options for housing development would diminish the benefits of Green Belt within the Borough to the public.

2.viii. Significant wildlife corridors and habitats which have established over decades would be lost through development of Green Belt sites.

2.ix. The Group understands there is no statutory obligation from Government for Councils to release Green Belt for housing. Rather, we believe Government calls for demonstration that housing needs can be met in other ways, eg. release of brown field sites, land banks

	<p>held by developers where planning permission has been granted but not developed, increased urban density.</p> <p>2.x. Since the launch of this Consultation, both Government and the Mayor of London have publicly stated their support for the protection of Green Belt nationally and specifically around London. Indeed in his London Plan published 27.11.17. Sadiq Khan explicitly describes the Green Belt as '<i>London's lung</i>' and stresses the important contribution to this by Green Belt in Home Counties such as Hertfordshire. The CCG therefore finds DBC premature in seeking to release local Green Belt to housing, when this is not statutory Government policy, nor we believe, do the circumstances fulfil the exceptional criteria described in the NPPF.</p>
Include files	
Number	Question 11
ID	LPIO15907
Full Name	Mrs Sue Yeomans
Company / Organisation	Chilterns Countryside Group
Position	Chairman
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>6.i. As already stated, the CCG is not in favour of Green Belt which meets NPPF criteria being released for housing development within the Borough.</p> <p>6.ii. CCG does not find that DBC has fully explored all alternative options to avoid development of Green Belt. Our reasons are given under the preceding headings.</p> <p>6.iii. CCG believes that growth should be primarily focused upon Hemel Hempstead, as the main town of the Borough, which has greater existing and potential capacity to support such growth and requisite infrastructure.</p>
Include files	
Number	Question 11
ID	LPIO16000
Full Name	Charlotte Ryan-Elliott
Company / Organisation	Kier Property
Position	Planner`
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"> Notably, our Client acknowledges that the I&O is specifically seeking public and stakeholder views

	<p>on Dacorum's approach/options to meeting un-met housing demand, as a result of recent evidence indicating that <i>"even if we encourage higher densities / taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or densities to fully meet our future growth needs."</i> (Pg 341&0 draft). Accordingly, our client urges that, in accordance with the NPPF, development potential of brownfield sites is truly maximised before Green Belt release is considered further. Whilst it is anticipated that both Green Belt release and intensification of Brownfield land is likely to be required to meet the Borough's significant uplift in housing need, we remind the Council of the Government's requirement for Local Authorities to look to address housing need on Brownfield land first.</p> <ul style="list-style-type: none"> • Our Site is Brownfield Land, currently vacant, with a history of being marketed for employment uses with no interest, and as such should form a valuable contribution to the overall delivery of houses within the Borough - ensuring the delivery of sufficient new housing in the Borough, in the early years of the new Local Plan being <p>These representations therefore provide further detail as to the availability, suitability and achievability of the Site for release from the existing employment allocation for residential development, whilst providing a direct response to the I&O consultation and other development options put forward by Dacorum in meeting unmet housing demand. Specifically, our client wishes to make comments on Dacorum's Housing Demand and Supply Position - demonstrating the acute need for the release of under-performing employment land, to meet future housing requirements (drawing on the key evidence base documents; including the Strategic Housing Market Assessment for South West Hertfordshire 2016, the Strategic Housing Land Availability Assessment (2015) and the Authority Monitoring Report (2015/16).</p>
Include files	
Number	Question 11
ID	LPIO16009
Full Name	Charlotte Ryan-Elliott
Company / Organisation	Kier Property
Position	Planner`
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	4.5 Page 34 of the I&O sets out the Councils proposed approach to selecting sites that are Brownfield. The document states that <i>"our priority will be to maximise the use of brownfield sites. Government expects us to</i>

	<i>demonstrate that we have fully explored such sites before Green Belt sites are considered."</i> Furthermore, the I&O goes on to states that <i>"the continued renewal of Hemet Hempstead new town, through the redevelopment of brownfield sites, will be a crucial part of the new Local Plan."</i> Accordingly, we strongly agree with this approach and consider that Brownfield sites must be utilised to their full potential in accordance with the core planning principles set out in paragraph 17 of the NPPF and we consider Hemel Hempstead the most appropriate location given its positioning at the top of the settlement hierarchy.
Include files	
Number	Question 11
ID	LPIO16015
Full Name	Charlotte Ryan-Elliott
Company / Organisation	Kier Property
Position	Planner`
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	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.
Include files	
Number	Question 11
ID	LPIO16022
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	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

	<p>over-development of Tring. Tring has specific issues being a small market town:-</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO16035
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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO16053
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>

GFRA Response to Question 11, full document attached to question 46

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) *Achievable or B) Suitable and C) Achievable*” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) *Achievable*” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following “*however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs*”. It is our opinion that this

	paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.
Include files	
Number	Question 11
ID	LPIO16091
Full Name	Helen and Aaron Talbot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO16107
Full Name	Helen and Aaron Talbot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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</p>

on Green Field sites) should be considered in the light of this.

GFRA Response to Question 11, full document attached to question 46

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) *Achievable or B) Suitable and C) Achievable*” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) *Achievable*” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following “*however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have,*

	<i>they will not provide sufficient sites or density to fully meet our future growth needs". It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</i>
Include files	
Number	Question 11
ID	LPIO16149
Full Name	Stuart Mcgrory
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 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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO16166
Full Name	Stuart Mcgrory
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 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>

GFRA Response to Question 11, full document attached to question 46

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) *Achievable or B) Suitable and C) Achievable*” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) *Achievable*” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

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At Paragraph 5.4.12 the Council states the following “*however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs*”. It is our opinion that this

	paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.
Include files	
Number	Question 11
ID	LPIO16206
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>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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO16222
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>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>

I am a resident of Tring. I do not believe the issues and options consultation has given adequate consideration for the alternative options highlighted in this report, rather than the consultation options being considered for building on green belt land. The options selected seem to have been identified purely on the basis that there were landowners keen to develop their land - that cannot be a sound basis for strategic planning.

GFRA Response to Question 11, full document attached to question 46

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are "*A) Achievable or B) Suitable and C) Achievable*" does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA "*C) Achievable*" is as flexible as it can be.

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The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear

	<p>that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO16268
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>please find the attached report written on mine and other residents request.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO16284
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>please find the attached report written on mine and other residents request.</p>

GFRA Response to Question 11, full document attached to question 46

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	paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.
Include files	
Number	Question 11
ID	LPIO16328
Full Name	Aaron Smith
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 support GFRA responses see below.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO16346
Full Name	Aaron Smith
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 support GFRA responses see below.</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is</p>

considered the reasonable process in principle to undertake site selection by the GFRA.

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With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following “*however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs*”. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files	
Number	Question 11
ID	LPIO16393
Full Name	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>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.</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 11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • Inclusion of higher density developments in appropriate areas of Hemel is not addressed in

	<p>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> <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO16433
Full Name	Gloria Shaw
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It uses Green Belt land when other more suitable land could be used
Include files	
Number	Question 11
ID	LPIO16442
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>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p>

	GFRA full document attached to question 46
Include files	
Number	Question 11
ID	LPIO16459
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>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</p> <p>Very few areas of brownfield land have been identified in the present plan. Targetting of such areas, based on good planning principles, should be performed, not just relying on developers proposing such land. (Developers would naturally prefer the lower costs of releasing Green Belt land, so are unlikely to initially suggest brownfield land.)</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock</p>

	<p>land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO16505
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>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</p> <p>Very few areas of brownfield land have been identified in the present plan. Targetting of such areas, based on</p>

good planning principles, should be performed, not just relying on developers proposing such land. (Developers would naturally prefer the lower costs of releasing Green Belt land, so are unlikely to initially suggest brownfield land.)

CCG response to question 11 full document attached to question 46

1 2. GREEN BELT

2.i. The fundamental aim of Green Belt policy remains to contain urban sprawl by keeping land permanently open; essential characteristics of Green Belts are their openness and permanence. The CCG regrets that the LP seeks to challenge and change Green Belt status in the Borough, and importantly, for the setting of the Chilterns AONB.

2.ii. Paragraph 80 of the National Planning Policy Framework (NPPF) sets out the 5 main purposes of the Green Belt which are:

- *to check the unrestricted sprawl of large built-up areas*
- *to prevent neighbouring towns from merging into one another*
- *to assist in safeguarding the countryside from encroachment*
- *to preserve the setting and special character of historic towns*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

2.iii. Clearly, the Green Belt in the Borough, particularly that around Tring and Berkhamsted, currently fulfils those functions. The CCG finds no justifiable cause for those essential functions to be considered unnecessary or potentially replaceable by the development of Suitable Alternative Natural Greenspaces (SANGs).

2.iv. The NPPF has a general presumption against development in Green Belt unless this meets the very special circumstances described in paragraphs 89 and 90. Clearly, the options of the LP do not do so. Therefore the CCG does not agree with release of current Green Belt land for housing unless and until such exceptional circumstances are met.

2.v. The NPPF does allow for review of Green Belt boundaries through preparation of a Local Plan (paragraph 83) and in the exceptional circumstances described in paragraph 85. Land which is used as open space, sport and recreation is protected by the NPPF. Green Belt sites particularly on the Eastern edge of Tring support all these activities, with good public access for walking, fishing on the Grand Union Canal, riding, running and cycling, together with valuable agricultural land. Public access such as that given by Marshcroft Lane, Tring, affords a good quality outdoor experience to people with limited physical mobility.

2.vi. All residents are aware of the widespread use of cycle routes, lanes and off-road paths by visitors, particularly ramblers and cyclists, to the area. Ease of access by road and rail from London and its suburbs makes the Chilterns a popular tourist destination which is healthy for participants and supports the local

	<p>economy. The large scale housing options of the LP will diminish this experience and impact negatively upon both the local and visiting communities.</p> <p>2.vii. Consistent with the NPPF objectives to enhance beneficial use of the Green Belt, paragraph 81 states that once Green Belts have been defined (which they already are), Councils should plan positively to achieve this aim by providing opportunities for outdoor sport and recreation (see pt 2.iv.); retaining and enhancing landscapes, visual amenity and biodiversity; or improving damaged and derelict land. The CCG finds limited opportunities within the LP for DBC to support these aims; indeed the options for housing development would diminish the benefits of Green Belt within the Borough to the public.</p> <p>2.viii. Significant wildlife corridors and habitats which have established over decades would be lost through development of Green Belt sites.</p> <p>2.ix. The Group understands there is no statutory obligation from Government for Councils to release Green Belt for housing. Rather, we believe Government calls for demonstration that housing needs can be met in other ways, eg. release of brown field sites, land banks held by developers where planning permission has been granted but not developed, increased urban density.</p> <p>2.x. Since the launch of this Consultation, both Government and the Mayor of London have publicly stated their support for the protection of Green Belt nationally and specifically around London. Indeed in his London Plan published 27.11.17. Sadiq Khan explicitly describes the Green Belt as '<i>London's lung</i>' and stresses the important contribution to this by Green Belt in Home Counties such as Hertfordshire. The CCG therefore finds DBC premature in seeking to release local Green Belt to housing, when this is not statutory Government policy, nor we believe, do the circumstances fulfil the exceptional criteria described in the NPPF.</p>
Include files	
Number	Question 11
ID	LPIO16514
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>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</p> <p>Very few areas of brownfield land have been identified in the present plan. Targetting of such areas, based on good planning principles, should be performed, not just</p>

	<p>relying on developers proposing such land. (Developers would naturally prefer the lower costs of releasing Green Belt land, so are unlikely to initially suggest brownfield land.)</p> <p>CCG response to question 11 full document attached to question 46</p> <p>1 <u>CHILTERN COUNTRYSIDE GROUP'S PREFERRED OPTION FROM OPTIONS GIVEN</u></p> <p>6.i. As already stated, the CCG is not in favour of Green Belt which meets NPPF criteria being released for housing development within the Borough.</p> <p>6.ii. CCG does not find that DBC has fully explored all alternative options to avoid development of Green Belt. Our reasons are given under the preceding headings.</p> <p>6.iii. CCG believes that growth should be primarily focused upon Hemel Hempstead, as the main town of the Borough, which has greater existing and potential capacity to support such growth and requisite infrastructure.</p>
Include files	
Number	Question 11
ID	LPIO16535
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>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <p>. It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.</p>

	<ul style="list-style-type: none"> . Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. . This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). . 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. . The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. . Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO16574
Full Name	mr Ian Passey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield must be used for housing if required
Include files	
Number	Question 11
ID	LPIO16586
Full Name	David and Marion Peacock
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites must be the <u>sole</u> targets for urban development.
Include files	
Number	Question 11
ID	LPIO16593
Full Name	Mr R. Perkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	They are totally unsustainable + any development should be on brownfield land, also approx 1,000 vacant properties in Herts to be utilised before any houses built
Include files	
Number	Question 11
ID	LPIO16606
Full Name	Fiona Dunn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Green Belt should not be built on, brownfield sites should be used.
Include files	
Number	Question 11
ID	LPIO16611
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 sites.
Include files	

Number	Question 11
ID	LPIO16629
Full Name	Mrs Maria McHale
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	More effort needs to be made to utilise existing brownfield sites and unused office space rather than developing Green Belt land.
Include files	

Number	Question 11
ID	LPIO16643
Full Name	Mrs Susan Bishop
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I want the brownfield sites to be built on, there is <u>no need whatsoever</u> to build on green belt!
Include files	
Number	Question 11
ID	LPIO16656
Full Name	Bridget Burke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I believe that the Council should explore the development of brownfield sites first as per Government policy or choose Option 1A to minimise building on Green Belt.
Include files	
Number	Question 11
ID	LPIO16665
Full Name	Mr Martin Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Brownfield sites should be developed first
Include files	
Number	Question 11
ID	LPIO16677
Full Name	Katie Parsons
Company / Organisation	Historic England
Position	Historic Environment Planning Advisor
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I have provided specific comments on site selection and allocation towards the end of his letter.
Include files	
Number	Question 11
ID	LPIO16802
Full Name	Jon G. Wright Dawn Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO16818
Full Name	Jon G. Wright Dawn Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic</p>

Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) *Achievable or B) Suitable and C) Achievable*” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) *Achievable*” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following “*however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs*”. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files

Number	Question 11
ID	LPIO16870
Full Name	Jan Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	

Number	Question 11
ID	LPIO16886
Full Name	Jan Mcgrory
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a</p>

mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following *“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”*. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files	
Number	Question 11
ID	LPIO16931
Full Name	Christine Pichon
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Before any of the proposals is decided upon, serious consideration should be given to brownfield sites, of which there are no doubt many in the borough.
Include files	
Number	Question 11
ID	LPIO16948
Full Name	Mr Derek Benson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Has Dacorum exhausted all brown field opportunities (Bovingdon brickworks?) before embarking upon an irreversible policy of defiling Green Belt ?
Include files	
Number	Question 11
ID	LPIO16950
Full Name	mr stephen lewis
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	/ There are other brownfield sites in Dacorum that should be used before green belt is used for housing, Green belt once used will never be recovered.
Include files	
Number	Question 11
ID	LPIO16958
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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LP1016974
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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable or B) Suitable and C) Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack</p>

	<p>of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) <i>Achievable</i>” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO17015
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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO17031
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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p>

	<p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO17072
Full Name	Grahame Senior
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 support and endorse the views expressed in the attached document as a member of GFRA</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to</p>

	<p>housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LP1017088
Full Name	Grahame Senior
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 support and endorse the views expressed in the attached document as a member of GFRA</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) <i>Achievable</i>” is as flexible as it can be.</p>

	<p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO17220
Full Name	Debbie Crooks Pam Moss
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 & 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>

Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

No

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure
- Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure
- This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
- 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
- The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns
- Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper

Include files	
Number	Question 11
ID	LPIO17278
Full Name	Margaret and Andrew 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>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>Brownfield sites must be given priority with higher density development in Hemel Hempstead. A new properly planned garden town is possible to be developed over a number of years.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO17319
Full Name	Mr David Parker

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO17335
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>6.We have not made sufficient use of existing brownfield sites in Tring where I believe most of the additional housing beyond the currently allocated numbers (which still have to be built to the SW of the town) can be accommodated. We should not move to build on precious high quality green belt land adjacent to areas of outstanding natural beauty with having fully exhausted existing brownfield sites and then, and only if proven necessary, to use the land to the south and north of the town which is much less sensitive green belt than that to the Eastern side. To do otherwise would cause significant harm to the surrounding countryside and how the settlements sits within the landscape.</p> <p>7.Any development must be of high quality homes the vast majority of which has to be affordable. Development must be mixed with appropriate commercial premise.</p>

GFRA Response to Question 11, full document attached to question 46

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) *Achievable or B) Suitable and C) Achievable*” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) *Achievable*” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following “*however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs*”. It is our opinion that this

	paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.
Include files	
Number	Question 11
ID	LP1017387
Full Name	Lesley 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 11 below (copy of full response attached to question 46)</p> <p>Question 11</p> <p><i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • Dacorum planners made it 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 • The current household build rate per annum in Berkhamsted is nearly twice that targeted, so that at the current rate the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing development numbers and site options • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure would apply (indeed to a greater amount) to substantial sites being promoted in the Market Towns of Berkhamsted and Tring • Strongly support development of brownfield sites before Green Belt sites are considered, however this objective is consistently

	<p>contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).</p> <ul style="list-style-type: none"> 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. 117 windfall developments are equivalent to a large site
Include files	
Number	Question 11
ID	LPIO17426
Full Name	Sara Bell
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 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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO17442
Full Name	Sara Bell
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 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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) <i>Achievable</i>” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever</p>

	<p>those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO17485
Full Name	Emma Talbot
Company / Organisation	The Little Cloth Rabbit
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a report (GFRA) about the proposed development of Tring.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO17501
Full Name	Emma Talbot
Company / Organisation	The Little Cloth Rabbit
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Please find attached a report (GFRA) about the proposed development of Tring.</p>

GFRA Response to Question 11, full document attached to question 46

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) *Achievable or B) Suitable and C) Achievable*” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) *Achievable*” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following “*however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs*”. It is our opinion that this

	<p>paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p> <p>...</p>
Include files	
Number	Question 11
ID	LPIO17549
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 11 below (copy of full response attached to question 46)</p> <p>Question 11</p> <p><i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • Dacorum planners made it 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 • The current household build rate per annum in Berkhamsted is nearly twice that targeted, so that at the current rate the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing development numbers and site options • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure would apply (indeed to a greater amount) to substantial sites being promoted in the Market Towns of Berkhamsted and Tring • Strongly support development of brownfield sites before Green Belt sites are considered, however this objective is consistently contradicted/compromised by giving extra

	<p>credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).</p> <ul style="list-style-type: none"> 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. 117 windfall developments are equivalent to a large site
Include files	
Number	Question 11
ID	LPIO17592
Full Name	Paul Hembury
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 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 & Development details my concerns comprehensively.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO17608
Full Name	Paul Hembury
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here

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 & Development details my concerns comprehensively.

In this regard, I am concerned that green belt sites are being considered before the availability and suitability of any and all brown field sites have been assessed.

Q11 – Tick NO

GFRA Response to Question 11, full document attached to question 46

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) *Achievable or B) Suitable and C) Achievable*” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) *Achievable*” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

	<p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO17650
Full Name	Guinness Partnership
Company / Organisation	Guinness Partnership
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>It should be noted that in the foreword to the Chiltern AONB Management Plan, the Chairman acknowledges the challenge of the need for more housing. Notwithstanding this, it is ironic that at Markyate the LPA is proposing to release 6 hectares of land from the Green Belt, when non Green Belt land in the AONB is in a more sustainable location.</p>
Include files	
Number	Question 11
ID	LPIO17666
Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>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</p>

	<p>our concerns, far more eloquently than we could do ourselves.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO17682
Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>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.</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable or B) Suitable and C) Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack</p>

	<p>of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) <i>Achievable</i>” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO17731
Full Name	Diana Woodward
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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.

BCA response to Question 11 below - full document attached to Question 46

Question 11

Do you agree with the proposed approach to selecting sites?

No

- Dacorum planners made it 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
- The current household build rate per annum in Berkhamsted is nearly twice that targeted, so that at the current rate the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing development numbers and site options
- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure would apply (indeed to a greater amount) to substantial sites being promoted in the Market Towns of Berkhamsted and Tring
- Strongly support development of brownfield sites before Green Belt sites are considered, however this objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
- 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. 117 windfall developments are equivalent to a large site.

Include files	
Number	Question 11
ID	LPIO17771
Full Name	John and Helen Osborne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO17787
Full Name	John and Helen Osborne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable or B) Suitable and C) Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack</p>

	<p>of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) <i>Achievable</i>” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO17829
Full Name	David and Jane Elsmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).

	<p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LP1017845
Full Name	David and Jane Elsmore
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon</p>

	<p>surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO17887
Full Name	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>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plans for additional building in the Tring area.</p> <p>I appreciate the need for additional housing in the region and that it is easier and cheaper to build on previously unused/agricultural land. However this does nothing to improve the ecology of the area or country. Especially as there are brown field sites available.</p>

	<p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LP1017903
Full Name	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>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plans for additional building in the Tring area.</p> <p>I appreciate the need for additional housing in the region and that it is easier and cheaper to build on previously unused/agricultural land. However this does nothing to improve the ecology of the area or country. Especially as there are brown field sites available.</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable or B) Suitable and C) Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack</p>

	<p>of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO17996
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	I wanted to quickly summarise how I feel about your plans for the redevelopment of Tring. I visited the recent

	<p>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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO18012
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 DOCUMEMNT) , my own views can be summarised in a handful of bullet point.</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable or B) Suitable and C) Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used</p>

without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following *“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”*. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files	
Number	Question 11
ID	LPIO18067
Full Name	Mr Graham Bright
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 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>Dacorum need to do more to explore brownfield options, not just accept the sites put forward by landowners, to determine whether all non-green belt sites have been fully appraised</p> <p>Dacorum need to acknowledge that the green belt needs to be protected, points 1 and 2 above need to be exhausted, before any more green belt is released. Dacorum are premature in recommending the unlocking of green belt (for point 1 see question 2)</p> <p>More work is required to evaluate which green belt sites are most suitable for housing development, taking in to account the impact on the environment, health & wellbeing and suitability for housing</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO18083
Full Name	Mr Graham Bright
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 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>Dacorum need to do more to explore brownfield options, not just accept the sites put forward by landowners, to</p>

determine whether all non-green belt sites have been fully appraised

Dacorum need to acknowledge that the green belt needs to be protected, points 1 and 2 above need to be exhausted, before any more green belt is released. Dacorum are premature in recommending the unlocking of green belt (for point 1 see question 2)

More work is required to evaluate which green belt sites are most suitable for housing development, taking in to account the impact on the environment, health & wellbeing and suitability for housing

GFRA Response to Question 11, full document attached to question 46

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “*A) Achievable or B) Suitable and C) Achievable*” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “*C) Achievable*” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

	<p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LP1018124
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>Development should be concentrated in Hemel Hempstead by building up in the town centre, adding more floors onto existing properties or demolishing sensitively, so as to preserve the character, and building higher to provide apartments especially for young people. Young people like to live in town centres and these properties would be cheaper for them than building large houses on green-field sites. Building higher in town centres is more sustainable because transport is concentrated in town centres which makes it more viable and so are other services such as jobs, schools, restaurants etc. Town centres are dying and this would help them be more vibrant.</p> <p>If you must add other sites, then the rest of Hemel should be expanded.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within</p>

	existing defined settlements within the Borough have not been fully exhausted. GFRA full document attached to question 46
Include files	
Number	Question 11
ID	LPIO18140
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>Development should be concentrated in Hemel Hempstead by building up in the town centre, adding more floors onto existing properties or demolishing sensitively, so as to preserve the character, and building higher to provide apartments especially for young people. Young people like to live in town centres and these properties would be cheaper for them than building large houses on green-field sites. Building higher in town centres is more sustainable because transport is concentrated in town centres which makes it more viable and so are other services such as jobs, schools, restaurants etc. Town centres are dying and this would help them be more vibrant.</p> <p>If you must add other sites, then the rest of Hemel should be expanded.</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within</p>

their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

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At Paragraph 5.4.12 the Council states the following *“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”*. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files	
Number	Question 11
ID	LPIO18181
Full Name	Nicky and Dave Hulse
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 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>No substantial work has yet been done to assess brownfield sites around the area. This should be priority, in my opinion as Green Belt boundaries should only be reallocated in 'exceptional circumstances'.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO18197
Full Name	Nicky and Dave Hulse
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 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>No substantial work has yet been done to assess brownfield sites around the area. This should be priority, in my opinion as Green Belt boundaries should only be reallocated in 'exceptional circumstances'.</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) Achievable or B) Suitable and C) Achievable” does not provide a mechanism to assess an alternative strategy for those</p>

sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

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At Paragraph 5.4.12 the Council states the following *“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”*. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files	
Number	Question 11
ID	LPIO18250
Full Name	Gail Skelton
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 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper

Include files	
Number	Question 11
ID	LPIO18294
Full Name	Terry and Jennifer Elliott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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 the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO18310
Full Name	Terry and Jennifer Elliott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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 the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p>GFRA Response to Question 11, full document attached to question 46</p>

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) *Achievable* or B) *Suitable* and C) *Achievable*” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) *Achievable*” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following “*however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs*”. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard

	to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.
Include files	
Number	Question 11
ID	LPIO18456
Full Name	Mrs Wendy Mclean
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	It suggest there is already a determination to develop green belt sites regardless of size and location which are already considered and in discussion to form the 'Marshall Plan'. There appears to be another plan period in force to cover homes 1130 homes already well along the planning process. In the case of the Two Waters and Apsley developments this appears to be an attempt to conceal the potential amount of homes to be constructed in an already densely packed area.
Include files	
Number	Question 11
ID	LPIO18478
Full Name	Melanine Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.

	<ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO18524
Full Name	Mrs Juliet Chodzko
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 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.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site

	<p>of 3000+ offer best opportunity to provide the necessary additional infrastructure</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO18571
Full Name	Captain Andrew Cassels
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 entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group)</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site

	<p>of 3000+ offer best opportunity to provide the necessary additional infrastructure</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO18617
Full Name	Lindy Weinreb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 11</p> <p><i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • Dacorum planners made it 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 • The current household build rate per annum in Berkhamsted is nearly twice that targeted, so that at the current rate the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing development numbers and site options

	<ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure would apply (indeed to a greater amount) to substantial sites being promoted in the Market Towns of Berkhamsted and Tring • Strongly support development of brownfield sites before Green Belt sites are considered, however this objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. 117 windfall developments are equivalent to a large site
Include files	
Number	Question 11
ID	LPIO18664
Full Name	Hilary Abbott
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would

	<p>be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure</p> <ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO18710
Full Name	Paul and Gillian Jenkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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, we would like to take this opportunity emphasize just a few of the most important points within that response.

Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

No

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure
- Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure
- This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
- 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
- The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns
- Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper

Include files	
Number	Question 11
ID	LPIO18756
Full Name	Berkhamsted Citizens
Company / Organisation	Berkhamsted Citizens
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 11</p> <p><i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • Dacorum planners made it 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 • The current household build rate per annum in Berkhamsted is nearly twice that targeted, so that at the current rate the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing development numbers and site options • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure would apply (indeed to a greater amount) to substantial sites being promoted in the Market Towns of Berkhamsted and Tring • Strongly support development of brownfield sites before Green Belt sites are considered, however this objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. 117 windfall developments are equivalent to a large site
Include files	
Number	Question 11
ID	LPIO18803
Full Name	Lyndsay Slater
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper

Include files	
Number	Question 11
ID	LPIO18852
Full Name	Andrew and Margit Dobbie
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • Inclusion of higher density developments in appropriate areas of Hemel is not addressed in

	<p>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> <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO18898
Full Name	Katherine Cassels
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 entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>...</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).

	<ul style="list-style-type: none"> • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	

Number	Question 11
ID	LPIO18941
Full Name	Rupert Symmons
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We are generally against large scale development on the green belt on the basis that this will result in irreversible harm to the borough.
Include files	
Number	Question 11
ID	LPIO18960
Full Name	Mrs Emma Robertson
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 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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO18976
Full Name	Mrs Emma Robertson
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 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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) <i>Achievable</i>” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever</p>

	<p>those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO19039
Full Name	Barbara Gainsley
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 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"> • Dacorum planners made it 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. • The current household build rate per annum in Berkhamsted is nearly twice that targeted, so that at the current rate the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing development numbers and site options • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure would apply (indeed to a greater amount) to substantial sites

	<p>being promoted in the Market Towns of Berkhamsted and Tring.</p> <ul style="list-style-type: none"> • Strongly support development of brownfield sites before Green Belt sites are considered, however this objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. 117 windfall developments are equivalent to a large site.
Include files	
Number	Question 11
ID	LPIO19080
Full Name	Bill Ahearn
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 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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO19096
Full Name	Bill Ahearn
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 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</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) <i>Achievable</i>” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p>

	At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i> . It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.
Include files	
Number	Question 11
ID	LPIO19138
Full Name	Ms Sarah Hain
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 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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO19154
Full Name	Ms Sarah Hain
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

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 11, full document attached to question 46

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) Achievable or B) Suitable and C) Achievable” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

	At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i> . It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.
Include files	
Number	Question 11
ID	LPIO19196
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association
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 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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO19212
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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.

GFRA Response to Question 11, full document attached to question 46

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) *Achievable or B) Suitable and C) Achievable*” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) *Achievable*” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

	At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i> . It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.
Include files	
Number	Question 11
ID	LPIO19253
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO19269
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are "A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>" does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA "C) <i>Achievable</i>" is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not</p>

	<p>considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO19323
Full Name	Stuart, Miranda & Melissa Kay
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 & 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>Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p>

	<ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO19370
Full Name	Wai Tang and Greg Barfoot
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 note we are aware that 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, 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>

We are particularly concerned about the following
 Q11. Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town

BRAG response to Question 11 (please note full document is attached to Q46)

Question 11 *Do you agree with the proposed approach to selecting sites?*

No

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure
- Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure
- This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
- 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
- The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns
- Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper

Include files	
Number	Question 11
ID	LPIO19419
Full Name	Philippa Jones
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 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>Question 11</p> <p><i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • Dacorum planners made it 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. • The current household build rate per annum in Berkhamsted is nearly twice that targeted, so that at the current rate the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing development numbers and site options • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure would apply (indeed to a greater amount) to substantial sites being promoted in the Market Towns of Berkhamsted and Tring. • Strongly support development of brownfield sites before Green Belt sites are considered, however this objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. 117 windfall developments are equivalent to a large site.
Include files	
Number	Question 11
ID	LPIO19458
Full Name	John Wignall
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 would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO19474
Full Name	John Wignall
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 would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation</p>

of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following *“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”*. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files	
Number	Question 11
ID	LPIO19515
Full Name	Kevin Cullen
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 refer to the attached report.(BRAG)</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO19531
Full Name	Kevin Cullen
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 refer to the attached report.(BRAG)</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p>

	<p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO19572
Full Name	Mark Lawson and Sharon Wilkie
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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>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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO19589
Full Name	Mark Lawson and Sharon Wilkie
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 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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable or B) Suitable and C) Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation</p>

of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following *“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”*. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files	
Number	Question 11
ID	LPIO19629
Full Name	Vivienne 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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO19645
Full Name	Vivienne 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>Q11 – Tick NO</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) Achievable or B) Suitable and C) Achievable” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward</p>

are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following *“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”*. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files	
Number	Question 11
ID	LPIO19689
Full Name	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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO19704
Full Name	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>Q11 – Tick NO</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) Achievable</p>

or B) Suitable and C) Achievable” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following *“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”*. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files	
Number	Question 11
ID	LPIO19758
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>Question 11</p> <p><i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • Dacorum planners made it 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. • The current household build rate per annum in Berkhamsted is nearly twice that targeted, so that at the current rate the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing development numbers and site options • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure would apply (indeed to a greater amount) to substantial sites being promoted in the Market Towns of Berkhamsted and Tring. • Strongly support development of brownfield sites before Green Belt sites are considered, however this objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. 117 windfall developments are equivalent to a large site.
Include files	
Number	Question 11
ID	LPIO19811
Full Name	Jon Esson
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 a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO19827
Full Name	Jon Esson
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 a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) Achievable or B) Suitable and C) Achievable” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within</p>

their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following *“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”*. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files	
Number	Question 11
ID	LPIO19895
Full Name	Chris Smith
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>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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 11</p>
<p>ID</p>	<p>LPIO19911</p>
<p>Full Name</p>	<p>Chris Smith</p>
<p>Company / Organisation</p>	
<p>Position</p>	
<p>Agent Name</p>	
<p>Company / Organisation</p>	
<p>Position</p>	
<p>Your Opinion - Please state your opinion here</p>	<p>No</p>
<p>Your response - Please add your response here</p>	<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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack</p>

	<p>of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO19952
Full Name	mrs sue van rhee
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please find attached the document produced on behalf of the Grove Fields Residents Association, which details

	<p>how strongly we feel about the proposed developments on Green belt land and without the appropriate supporting infrastructure..</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO19968
Full Name	mrs sue van rhee
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 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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable or B) Suitable and C) Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack</p>

	<p>of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) <i>Achievable</i>” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO20009
Full Name	Kate and Ben Marston
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	<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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO20025
Full Name	Kate and Ben Marston
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) Achievable or B) Suitable and C) Achievable” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used</p>

without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following *“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”*. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files	
Number	Question 11
ID	LPIO20066
Full Name	Maurice and Christine O'Keefe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO20082
Full Name	Maurice and Christine O'Keefe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are "A) Achievable or B) Suitable and C) Achievable" does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that</p>

	<p>has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO20123
Full Name	Sherry and Haydn Bond
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please find attached a copy of the issues report for Tring.

	<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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO20139
Full Name	Sherry and Haydn Bond
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 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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable or B) Suitable and C) Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more</p>

	<p>sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO20181
Full Name	Dianne Pilkington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO20197
Full Name	Dianne Pilkington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<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</p>

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.

Thank you

GFRA Response to Question 11, full document attached to question 46

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are "A) *Achievable or B) Suitable and C) Achievable*" does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA "C) *Achievable*" is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

	At Paragraph 5.4.12 the Council states the following “however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.
Include files	
Number	Question 11
ID	LPIO20245
Full Name	Mr Peter 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>I have seen the submission to DBC by the Berkhamsted Residents Action Group (BRAG), the contents of which I support.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • Inclusion of higher density developments in appropriate areas of Hemel is not addressed in

	<p>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> <ul style="list-style-type: none"> • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO20284
Full Name	David Clarke
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 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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>

Include files	
Number	Question 11
ID	LPIO20300
Full Name	David Clarke
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 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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are "A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>" does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p>

	<p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO20342
Full Name	Deborah Turnbull
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 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>Summary Section from GFRA – Executive summary</p>

	<p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO20358
Full Name	Deborah Turnbull
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 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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third</p>

	<p>element of criteria within the SHLAA “C) <i>Achievable</i>” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO20406
Full Name	Jane Collis
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 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>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p>

	<p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO20450
Full Name	Mr David Parker
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 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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO20467
Full Name	Mr David Parker
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 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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used</p>

without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.

At Paragraph 5.4.12 the Council states the following *“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”*. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.

Include files	
Number	Question 11
ID	LPIO20515
Full Name	DR Brigitta Case
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 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 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.</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>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns

- Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper

Berkhamsted Citizens response

Question 11

Do you agree with the proposed approach to selecting sites?

No

- Dacorum planners made it 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
- The current household build rate per annum in Berkhamsted is nearly twice that targeted, so that at the current rate the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing development numbers and site options
- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure would apply (indeed to a greater amount) to substantial sites being promoted in the Market Towns of Berkhamsted and Tring
- Strongly support development of brownfield sites before Green Belt sites are considered, however this objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
- 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. 117 windfall developments are equivalent to a large site

Include files	
Number	Question 11
ID	LPIO20562
Full Name	Christine Manning
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 would like to support the views put forward by the Berkhamsted Citizens Association in their response to the Core Strategy</p> <p>Question 11</p> <p><i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • Dacorum planners made it 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 • The current household build rate per annum in Berkhamsted is nearly twice that targeted, so that at the current rate the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing development numbers and site options • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure would apply (indeed to a greater amount) to substantial sites being promoted in the Market Towns of Berkhamsted and Tring • Strongly support development of brownfield sites before Green Belt sites are considered, however this objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. 117 windfall developments are equivalent to a large site
Include files	
Number	Question 11
ID	LP1020603
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	No
Your response - Please add your response here	<p>It will be important to ensure that as well as considering the conclusions of the Green Belt review and Sustainability appraisal, that the suitability, availability and deliverability of the sites and their ability to contribute to meeting supporting infrastructure requirements is considered as part of the new Plan.</p> <p><u>Dunsley Farm</u></p> <p>While we support the fundamental approach to site selection set out in the Issues and options consultation, we believe that the potentially developable area at Dunsley Farm has been arbitrarily constrained in the stage 2 Green Belt and Landscape review. A hedge line has been chosen as being the potential site boundary, when there is no really good reason why it could not be the hedge line further to the south separating the site from London Road. In addition the arbitrary selection of the potential new boundary ignores the fact that certain land uses, for example playing fields, would preserve the fundamental openness of the Green belt and preserves the openness of that part of the site in perpetuity.</p> <p>The accompanying representations made in relation to the Call for Sites 2017 is accompanied by high level landscape and visual impact assessment advice, as well as high level highways advice. It illustrates how greater use could be made of the site, with open space or playing fields preserving the openness of significant elements of the site to the south east boundary with London Road and Cow Lane.</p> <p><u>Wayside Farm</u></p> <p>High level landscape and visual impact assessment, and high level highways advice has informed the separate representations which have been made in relation to Wayside Farm. The suggestion of this work is that from a visual impact and openness perspective, the potentially developable areas of the site are limited to the more low lying parts of the site.</p> <p>Similarly, the high level highways advice suggests that there are issues of highways capacity at the south end of Kings Langley, on the A4251 Watford Road and associated with Junction 20 of the M25 with the A41/A4251. The suggestion is that these will need to be addressed in order to realise the sites development potential at the scale envisaged by the Local Planning Authority in the Issues and Options consultation document.</p> <p>The efficacy of measures associated with the South West Herts Growth and Transport Plan intended to alleviate highways capacity and traffic management issues will only become clear post 2026, and therefore the approach to the Local Plan, potentially of safeguarding land or identifying reserve sites is considered to be prudent and worth further discussion. Given its proximity to Kings Langley</p>

	railway station, it is considered that the site has the potential to appeal to be commercially attractive to a range of employment occupiers.
Include files	
Number	Question 11
ID	LPIO20618
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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO20634
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>GFRA Response to Question 11, full document attached to question 46</p>

The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.

It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) *Achievable or B) Suitable and C) Achievable*” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.

Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) *Achievable*” is as flexible as it can be.

With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.

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At Paragraph 5.4.12 the Council states the following “*however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs*”. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard

	to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.
Include files	
Number	Question 11
ID	LPIO20674
Full Name	Keiron Wybrow
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 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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO20690
Full Name	Keiron Wybrow
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 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>GFRA Response to Question 11, full document attached to question 46</p>

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At Paragraph 5.4.12 the Council states the following “*however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs*”. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard

	to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.
Include files	
Number	Question 11
ID	LPIO20738
Full Name	Christopher Townsend
Company / Organisation	
Position	Councillor, Tring Town Council
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<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>There is concern that the process of identifying sites is skewed towards the most aggressive developers who are purely profit motivated. Effort should be made to secure sites which would be most beneficial to the settlement/surrounding area in light of the various strategies and visions – sites which have not been forthcoming during the ‘call-for-sites’ exercise.</p> <p>Paraphrasing: have a vision and look for the sites to fulfil it; not make the best of what you get.</p>
Include files	
Number	Question 11
ID	LPIO20786
Full Name	Usha Kilich
Company / Organisation	Northchurch Parish Council
Position	Parish Clerk
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Northchurch is almost at its infrastructure capacity. We support development of brownfield sites before greenfield sites. Gardens are “Greenfield” sites and development should be discouraged as indicated in the Government White paper. We are not in favour of high rise buildings as a means of increasing density.</p>
Include files	
Number	Question 11
ID	LPIO20832

Full Name	Mr Iain Manson
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 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>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper

Include files	
Number	Question 11
ID	LPIO20877
Full Name	Mrs. Sue 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>I welcome the opportunity to contribute to the Dacorum Borough Council's (DBC) consultation on Issues & Options Local Plan to 2036 and request that my comments below are fully taken into account in further deliberations on the Local Plan.</p> <p>Whilst I have given detail on some issues below, I totally support the response made by the Chiltern Countryside Group (CCG), which gives further comment on these key matters. Please refer to the CCG submission for my full response.</p> <ol style="list-style-type: none"> 1 1. I am strongly against Green Belt which meets NPPF criteria being released for housing development within the Borough. 1 I do not find that DBC has fully explored all alternative options to avoid development of Green Belt. These may, but wholly include, statutory co-operation with adjoining Local Authorities on housing needs, which seems sorely lacking; brown field sites; land held by developers where planning permission has been granted but not taken up; higher urban densities. 1 Additionally, I refer DBC to the obligations set out in paragraphs 80, 85, 89 and 90 of the NPPF regarding status and protection of Green Belt. I don't find the Local Plan meets those obligations. <p>Chiltern Conservation Group response below</p> <ol style="list-style-type: none"> 1 <u>2. GREEN BELT</u> <p>2.i. The fundamental aim of Green Belt policy remains to contain urban sprawl by keeping land permanently open; essential characteristics of Green Belts are their openness and permanance. The CCG regrets that the LP seeks to challenge and change Green Belt status in the Borough, and importantly, for the setting of the Chilterns AONB.</p> <p>2.ii. Paragraph 80 of the National Planning Policy Framework (NPPF) sets out the 5 main purposes of the Green Belt which are: _</p> <ul style="list-style-type: none"> • <i>to check the unrestricted sprawl of large built-up areas</i> • <i>to prevent neighbouring towns from merging into one another</i> • <i>to assist in safeguarding the countryside from encroachment</i>

- *to preserve the setting and special character of historic towns*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

2.iii. Clearly, the Green Belt in the Borough, particularly that around Tring and Berkhamsted, currently fulfils those functions. The CCG finds no justifiable cause for those essential functions to be considered unnecessary or potentially replaceable by the development of Suitable Alternative Natural Greenspaces (SANGs).

2.iv. The NPPF has a general presumption against development in Green Belt unless this meets the very special circumstances described in paragraphs 89 and 90. Clearly, the options of the LP do not do so. Therefore the CCG does not agree with release of current Green Belt land for housing unless and until such exceptional circumstances are met.

2.v. The NPPF does allow for review of Green Belt boundaries through preparation of a Local Plan (paragraph 83) and in the exceptional circumstances described in paragraph 85. Land which is used as open space, sport and recreation is protected by the NPPF. Green Belt sites particularly on the Eastern edge of Tring support all these activities, with good public access for walking, fishing on the Grand Union Canal, riding, running and cycling, together with valuable agricultural land. Public access such as that given by Marshcroft Lane, Tring, affords a good quality outdoor experience to people with limited physical mobility.

2.vi. All residents are aware of the widespread use of cycle routes, lanes and off-road paths by visitors, particularly ramblers and cyclists, to the area. Ease of access by road and rail from London and its suburbs makes the Chilterns a popular tourist destination which is healthy for participants and supports the local economy. The large scale housing options of the LP will diminish this experience and impact negatively upon both the local and visiting communities.

2.vii. Consistent with the NPPF objectives to enhance beneficial use of the Green Belt, paragraph 81 states that once Green Belts have been defined (which they already are), Councils should plan positively to achieve this aim by providing opportunities for outdoor sport and recreation (see pt 2.iv.); retaining and enhancing landscapes, visual amenity and biodiversity; or improving damaged and derelict land. The CCG finds limited opportunities within the LP for DBC to support these aims; indeed the options for housing development would diminish the benefits of Green Belt within the Borough to the public.

2.viii. Significant wildlife corridors and habitats which have established over decades would be lost through development of Green Belt sites.

2.ix. The Group understands there is no statutory obligation from Government for Councils to release Green Belt for housing. Rather, we believe Government calls for demonstration that housing needs can be met in other ways, eg. release of brown field sites, land banks held by developers where planning permission has been granted but not developed, increased urban density.

	2.x. Since the launch of this Consultation, both Government and the Mayor of London have publicly stated their support for the protection of Green Belt nationally and specifically around London. Indeed in his London Plan published 27.11.17. Sadiq Khan explicitly describes the Green Belt as ' <i>London's lung</i> ' and stresses the important contribution to this by Green Belt in Home Counties such as Hertfordshire. The CCG therefore finds DBC premature in seeking to release local Green Belt to housing, when this is not statutory Government policy, nor we believe, do the circumstances fulfil the exceptional criteria described in the NPPF.
Include files	
Number	Question 11
ID	LPIO20886
Full Name	Mrs. Sue 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>I welcome the opportunity to contribute to the Dacorum Borough Council's (DBC) consultation on Issues & Options Local Plan to 2036 and request that my comments below are fully taken into account in further deliberations on the Local Plan.</p> <p>Whilst I have given detail on some issues below, I totally support the response made by the Chiltern Countryside Group (CCG), which gives further comment on these key matters. Please refer to the CCG submission for my full response.</p> <p>1 1. I am strongly against Green Belt which meets NPPF criteria being released for housing development within the Borough.</p> <p>1 I do not find that DBC has fully explored all alternative options to avoid development of Green Belt. These may, but wholly include, statutory co-operation with adjoining Local Authorities on housing needs, which seems sorely lacking; brown field sites; land held by developers where planning permission has been granted but not taken up; higher urban densities.</p> <p>9. Additionally, I refer DBC to the obligations set out in paragraphs 80, 85, 89 and 90 of the NPPF regarding status and protection of Green Belt. I don't find the Local Plan meets those obligations</p> <p>Chiltern Conservation Group response below</p> <p>6.i. As already stated, the CCG is not in favour of Green Belt which meets NPPF criteria being released for housing development within the Borough.</p> <p>6.ii. CCG does not find that DBC has fully explored all alternative options to avoid development of Green Belt. Our reasons are given under the preceding headings.</p>

	6.iii. CCG believes that growth should be primarily focused upon Hemel Hempstead, as the main town of the Borough, which has greater existing and potential capacity to support such growth and requisite infrastructure.
Include files	
Number	Question 11
ID	LPIO20908
Full Name	Mr Jake Storey
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 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>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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

	<p>it is considered fully before the easy option of Green Belt release</p> <ul style="list-style-type: none">• The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns• Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	

Number	Question 11
ID	LPIO20963
Full Name	Mr & Mrs J.D Batty
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 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>Q11.BRAG. There are greenfield sites (on public sector land) in Hemel Hempstead which should be considered. Or are DBC rating them of higher environmental and ecological value than designated Green Belt?</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large sites of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).

- 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
- The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns
- Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper

Berkhamsted Town Council response

Question 11 *Do you agree with the proposed approach to selecting sites?*

Policy CS1 of the Core Strategy states that “Any new development should:

- be based on the neighbourhood concept;
- provide for its own infrastructure; and
- support relevant town wide ”

This policy also states:

“The market towns and large villages will accommodate new development for housing, employment and other uses, provided that it:

- 1 is of scale commensurate with the size of the settlement and the range of local services and facilities;
- 2 helps maintain the vitality and viability of the settlement and the surrounding countryside;
- 3 causes no damage to the existing character of the settlement or its surrounding countryside; and
- 4 is compatible with policies protecting the Green Belt and Rural ”

Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted and Northchurch (1180 for 2006 – 2031) could not be sustained on infrastructure grounds. The market towns and large villages were identified as Areas of Limited Opportunity. In Table 1: Settlement Hierarchy of Core Strategy it is stated that “The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs.”

Significant Green Belt release on the edge of the Berkhamsted and Northchurch settlement will clearly breach these policy assurances.

We note again the Inspector’s Report to Dacorum Borough Council [July 2013, Q9 for the reference no.] which states, with reference to market towns, “...However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing

sustainable growth in the Borough's main town." para 39]

It is illogical to exclude large sites in excess of 3000. Large sites of 3000 or more should be included in the assessment as they provide the best opportunity to provide the necessary additional infrastructure.

The current household build rate per annum in Berkhamsted and Northchurch is significantly above target, indeed at the current rate most of the estimated target capacity (1180) will be deployed by 2020 – that is 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing the allocation of development numbers across the Borough and site options.

The cumulative impact of small scale developments, including windfall, on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. For example the construction of 100 dwellings as windfall over a number of years leads to the same infrastructure burden as an allocated site of 100. An assessment of the infrastructure requirements arising from a steady accumulation of "small sites" is needed, with a view to estimating future needs.

We support the maximisation of brownfield sites for development. However, their use should be accompanied by an assessment of their impact on infrastructure.

Gardens are "Greenfield" sites and development should be discouraged as indicated in the Government white paper.

We strongly support development of brownfield sites before Green Belt sites are considered. However, this objective is contradicted and compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years).

The inclusion of higher density developments in appropriate areas of Hemel Hempstead is not addressed in any detail in the proposed approach. More emphasis on e.g. taller buildings in appropriate areas will enable higher urban capacities and reduce pressure on the Green Belt.

Include files	
Number	Question 11
ID	LPIO21032
Full Name	julie owen
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 attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO21048
Full Name	julie owen
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 attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p>

	<p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO21097
Full Name	Sheron Wilkie
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 attached report regarding your proposed development in Tring as submission opposing this proposal. (GFRA)</p> <p>Summary Section from GFRA – Executive summary</p>

	<p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO21113
Full Name	Sheron Wilkie
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 attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are “A) <i>Achievable</i> or B) <i>Suitable</i> and C) <i>Achievable</i>” does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third</p>

	<p>element of criteria within the SHLAA “C) Achievable” is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO21158
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	No
Your response - Please add your response here	<ul style="list-style-type: none"> • SADBDF agrees with the general approach detailed for site selection set out in the Plan, considering Brownfield sites first, but also supports recognition for a requirement for Greenfield sites to contribute to delivery of growth • There is some concern over the level of detail provided with regard to site selection; there is no clear methodology for how sites have been

	<p>discounted, or carried forward for further consideration.</p> <ul style="list-style-type: none"> • The SHLAA offers some information on this process. However, there are inconsistencies between how sites are assessed, and there is no clear process given as to how sites are selected for inclusion in the site assessment schedule over others that were discounted. • A key concern also is that sites that come forward through the current Call for Sites process will not be given fair consideration over those already considered within the SHLAA, or the Plan itself. • SADBf strongly suggest a clear site assessment methodology is published, that provides clear site assessment criteria and is updated to include new sites put forward through the ongoing Call for Sites submission • A particular concern is the oversight of land within the Rural Area beyond the Green Belt that can contribute to housing needs, and also the sustainable growth of small villages. Of particular interest is land west of Long Marston, identified in the SHLAA as suitable for redevelopment
Include files	
Number	Question 11
ID	LPIO21189
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. • The same arguments about pressure on local infrastructure applies to a greater extent for substantial sites being promoted in the Market Towns of Berkhamsted and Tring • I strongly support maximisation of development of brownfield sites before Green Belt sites are considered. Any development should be preceded by a comprehensive assessment of their impact on infrastructure.

	<ul style="list-style-type: none"> • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed - especially in our market towns
Include files	
Number	Question 11
ID	LPIO21241
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>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>Support the approach to maximise use of brownfield sites, and identifying the AONB as a very important factor in assessing where development should be located.</p> <p>The Chilterns Conservation Board recommends the Council undertakes further detailed work on the impacts of developing sites (both individually and cumulatively) on the Chilterns AONB. We would be willing to assist with the scope and brief for such work, which should include landscape and visual impact assessment as well as coverage of effects on tranquillity, ecology, water abstraction from chalk streams, air quality, dark skies etc.</p>
Include files	
Number	Question 11
ID	LPIO21281
Full Name	Sarah Lightfoot
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 strongly support the Chiltern Countryside Group's submission regarding the Green Belt and AONB (below)</p> <p>1 <u>2. GREEN BELT</u></p> <p>2.i. The fundamental aim of Green Belt policy remains to contain urban sprawl by keeping land permanently open; essential characteristics of Green Belts are their openness and permanance. The CCG regrets that the LP seeks to challenge and change Green Belt status in the Borough, and importantly, for the setting of the Chilterns AONB.</p> <p>2.ii. Paragraph 80 of the National Planning Policy Framework (NPPF) sets out the 5 main purposes of the Green Belt which are: _</p> <ul style="list-style-type: none"> • <i>'to check the unrestricted sprawl of large built-up areas</i> • <i>'to prevent neighbouring towns from merging into one another</i> • <i>'to assist in safeguarding the countryside from encroachment</i> • <i>'to preserve the setting and special character of historic towns</i> • <i>'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'</i> <p>2.iii. Clearly, the Green Belt in the Borough, particularly that around Tring and Berkhamsted, currently fulfils those functions. The CCG finds no justifiable cause for those essential functions to be considered unnecessary or potentially replaceable by the development of Suitable Alternative Natural Greenspaces (SANGs).</p> <p>2.iv. The NPPF has a general presumption against development in Green Belt unless this meets the very special circumstances described in paragraphs 89 and 90. Clearly, the options of the LP do not do so. Therefore the CCG does not agree with release of current Green Belt land for housing unless and until such exceptional circumstances are met.</p> <p>2.v. The NPPF does allow for review of Green Belt boundaries through preparation of a Local Plan (paragraph 83) and in the exceptional circumstances described in paragraph 85. Land which is used as open space, sport and recreation is protected by the NPPF. Green Belt sites particularly on the Eastern edge of Tring support all these activities, with good public access for walking, fishing on the Grand Union Canal, riding, running and cycling, together with valuable agricultural land. Public access such as that given by Marshcroft Lane, Tring, affords a good quality outdoor experience to people with limited physical mobility.</p> <p>2.vi. All residents are aware of the widespread use of cycle routes, lanes and off-road paths by visitors, particularly ramblers and cyclists, to the area. Ease of access by road and rail from London and its suburbs makes the Chilterns a popular tourist destination which is healthy for participants and supports the local economy. The large scale housing options of the LP</p>

	<p>will diminish this experience and impact negatively upon both the local and visiting communities.</p> <p>2.vii. Consistent with the NPPF objectives to enhance beneficial use of the Green Belt, paragraph 81 states that once Green Belts have been defined (which they already are), Councils should plan positively to achieve this aim by providing opportunities for outdoor sport and recreation (see pt 2.iv.); retaining and enhancing landscapes, visual amenity and biodiversity; or improving damaged and derelict land. The CCG finds limited opportunities within the LP for DBC to support these aims; indeed the options for housing development would diminish the benefits of Green Belt within the Borough to the public.</p> <p>2.viii. Significant wildlife corridors and habitats which have established over decades would be lost through development of Green Belt sites.</p> <p>2.ix. The Group understands there is no statutory obligation from Government for Councils to release Green Belt for housing. Rather, we believe Government calls for demonstration that housing needs can be met in other ways, eg. release of brown field sites, land banks held by developers where planning permission has been granted but not developed, increased urban density.</p> <p>2.x. Since the launch of this Consultation, both Government and the Mayor of London have publicly stated their support for the protection of Green Belt nationally and specifically around London. Indeed in his London Plan published 27.11.17. Sadiq Khan explicitly describes the Green Belt as '<i>London's lung</i>' and stresses the important contribution to this by Green Belt in Home Counties such as Hertfordshire. The CCG therefore finds DBC premature in seeking to release local Green Belt to housing, when this is not statutory Government policy, nor we believe, do the circumstances fulfil the exceptional criteria described in the NPPF.</p>
Include files	
Number	Question 11
ID	LPIO21290
Full Name	Sarah Lightfoot
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 strongly support the Chiltern Countryside Group's submission regarding the Green Belt and AONB (below)</p> <p>6.i. As already stated, the CCG is not in favour of Green Belt which meets NPPF criteria being released for housing development within the Borough.</p> <p>6.ii. CCG does not find that DBC has fully explored all alternative options to avoid development of Green Belt. Our reasons are given under the preceding headings.</p>

	6.iii. CCG believes that growth should be primarily focused upon Hemel Hempstead, as the main town of the Borough, which has greater existing and potential capacity to support such growth and requisite infrastructure.
Include files	
Number	Question 11
ID	LPIO21312
Full Name	Antony Harbidge
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 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>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).

	<ul style="list-style-type: none"> • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LP1021358
Full Name	Helen Kington
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 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>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure

	<ul style="list-style-type: none"> • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO21403
Full Name	James Good
Company / Organisation	Angle Property Limited
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><i>Question 11: Do you agree with the proposed approach to selecting sites?</i></p> <p><u>Response:</u></p> <p>Yes</p> <p><u>Details:</u></p> <p>Development sites should be selected taking into account development needs, settlement visions, the proposed distribution pattern as well as the characteristics of individual sites.</p> <p>APL supports the promotion of development on brownfield sites as a priority, but considers that the Plan should recognise that some brownfield sites are located within the Green Belt. In accordance with paragraph 89 of the NPPF redevelopment of these sites should be permitted. Where such sites are located adjoining or close to existing settlements, and well related to the facilities and services of nearby centres, development of such sites should be prioritised.</p>

Include files	
Number	Question 11
ID	LPIO21418
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>1.12.1 The Landowners agree with the general approach detailed for site selection set out in The Plan; considering brownfields sites first, but also with recognition for a requirement the greenfield sites to contribute to delivery of growth is supported</p> <p>1.12.2 There is some concern over the level of detail provided with regards to site selection; there is not a clear methodology for how sites have been discounted, or carried forward for further consideration.</p> <p>1.12.3 The SHLAA offers some information on this process, however, there are inconsistencies between how sites are assessed, and there is also not a clear process given to how the sites selected for inclusion in the site assessment schedule over others that were discounted</p> <p>1.12.4 A key concern also, is that sites that come forward through the current Call for Sites process will not be given fair consideration over those already considered within the SHLAA, or The Plan itself.</p> <p>1.12.5 The Landowners strongly suggest a clear site assessment methodology is published, that provides clear site assessment criteria and is updated to include new sites put forward through the ongoing call for sites submission</p>
Include files	
Number	Question 11
ID	LPIO21445
Full Name	Majesticare Limited
Company / Organisation	Majesticare Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>27. We welcome the approach to plan for a variety of sites over the plan period (up to 2036) to ensure a steady release of land and to promote opportunities for a range of developers. The consultation document states that sites have to be available, suitable and achievable in order to be allocated, as per footnote 11 of the</p>

	<p>Framework. We consider this to be a sound test for the allocation of sites within the emerging Local Plan (up to 2036).</p> <p>28. The site at Spring Garden Lane can be considered as available, suitable and achievable for the development of a high quality care home that meets the identified needs of Berkhamsted and the borough as a whole. The site is located within the Green Belt and the AONB, however there are no physical restrictions that have been identified at this stage that would prevent the site from being delivered within the next five years</p>
Include files	
Number	Question 11
ID	LPIO21461
Full Name	Audley Court Ltd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>28. We welcome the overall approach to selecting sites, which is recommended in the Framework (footnote 11), that states: <i>“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.”</i> This is broadly the approach taken by the Council, with further aspirations to plan for a variety of sites over the plan period (up to 2036) in order to promote opportunities for a range of developers, and ensure a steady release of land throughout the plan period. We consider this nationally recognised approach to be a sound test for selecting suitable sites to allocate within the new Local Plan (up to 2036) in accordance with paragraph 182 of the Framework.</p> <p>29. The site at Bank Mill Lane can be considered as available, suitable and achievable for the development of a high quality Care Community, and has been correctly identified as sustainable and deliverable within a five year period within the The Schedule of Set Appraisals (for Large Greenfield Sites) (October 2017) Draft</p>
Include files	
Number	Question 11
ID	LPIO21491
Full Name	Hightown Housing Association
Company / Organisation	Hightown Housing Association
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Question 11 Do you agree with the proposed approach to selecting sites? Yes</p> <p>The proposed approach to selecting sites appears to be in line with good practice and the Government's guidance. The key priority for our client is to ensure sufficient sites are identified to meet identified need for the full range of housing types, particularly affordable housing and housing for older persons.</p>
Include files	
Number	Question 11
ID	LPIO21538
Full Name	Mrs Valerie Silverton
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 have read the proposals and strongly agree BRAG's responses.</p> <p>BRAG response to Question 11 (please note full document is attached to Q46)</p> <p>Question 11 <i>Do you agree with the proposed approach to selecting sites?</i></p> <p>No</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).

	<ul style="list-style-type: none"> • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper
Include files	
Number	Question 11
ID	LPIO21579
Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>Summary Section from GFRA – Executive summary</p> <p>It has been concluded that the consideration of the overall ability of Green Belt sites to contribute or not to housing allocation is at this point premature, as the robustness of the assessment of brownfield options, including increasing density, increase in scale and massing, to incorporate such housing targets within existing defined settlements within the Borough have not been fully exhausted.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 11
ID	LPIO21595
Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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>GFRA Response to Question 11, full document attached to question 46</p> <p>The general methodology undertaken by the Council through the identification of a settlement hierarchy, minimum threshold of contribution of sites by way of size and subsequent assessment of the deliverability and developable nature of sites through the initial Strategic Housing Land Availability Assessment (SHLAA) is considered the reasonable process in principle to undertake site selection by the GFRA.</p> <p>It is considered at this point that the Strategic Housing Land Availability Assessment, which is essentially used (in conjunction with the schedule of site appraisals document) to assess whether sites are "A) Achievable or B) Suitable and C) Achievable" does not provide a mechanism to assess an alternative strategy for those sites. For example these sites that are brought forward are given an approximate assessment of proposed density that would be suitable, however this is used without any significant assessment of the maximisation of densities being considered by Local Authorities within their brownfield assessment. As such the approach that has been taken to the SHLAA so far is considered to be prematurely discounting otherwise suitable sites in more sustainable and less harmful locations due to the lack of flexibility in consideration of density, housing mix and massing that can be associated with those sites.</p> <p>Where the alternative, due to not fully exhausting the options associated with brownfield sites, is to unlock land that will have a significantly harmful impact upon surrounding countryside, it is important that the third element of criteria within the SHLAA "C) Achievable" is as flexible as it can be.</p> <p>With regard to the consideration of brownfield sites it is noted by the Local Authority that the availability of brownfield sites is reduced over the assessed period from 2006 through to the preparation of this Local Plan. However as subsequently identified there is a priority to maximise brownfield site and demonstrate through the requirements of the Housing White Paper that all brownfield sites have been fully explored. It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of</p>

	<p>brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.</p> <p>The continued renewal of Hemel Hempstead New Town is welcomed as it is our opinion that the infrastructure, availability and lack of harm that could be prescribed to the area surrounding Hemel Hempstead makes clear that the predominant housing requirements whatever those requirements are, should be located within Hemel Hempstead, given that the infrastructure can support it.</p> <p>At Paragraph 5.4.12 the Council states the following <i>“however, even if we encourage higher density/taller buildings on the remaining brownfield sites we have, they will not provide sufficient sites or density to fully meet our future growth needs”</i>. It is our opinion that this paragraph has not been justified through any substantive conclusions drawn from any assessments with regard to higher densities and taller buildings. That work is still clearly lacking from the Councils preparation from the Local Plan and it is considered that this should be given the highest priority in advance of any site selection.</p>
Include files	
Number	Question 11
ID	LPIO21663
Full Name	Hannah Pattinson
Company / Organisation	Linden Homes
Position	Strategic Land Regional Director
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>District Capacity and Strategy</p> <p>The Issues and Options Local Plan identifies potential for 11,000 houses on sites that meet current policy (i.e. not greenfield, Green Belt locations). This is considered to be optimistic based on the identified sources of supply. The need for a balance between housing and jobs is an important consideration for sustainable development and the redevelopment of employment land should not just be used without proper consideration of the impacts on the economy. Reliance on brownfield land also creates potential for delay based on issues such as contamination and land assembly problems which impact on deliverability. A greater proportion of greenfield development is necessary to ensure housing targets are delivered over the plan period.</p> <p>SHLAA and AONB</p> <p>The site at Pea Lane was not identified as “suitable” in the SHLAA based on the following conclusion <i>“The site falls within the Green Belt. The land may be suitable for future development subject to the outcome of the DBC Green Belt Review and other technical work under their</i></p>

	<p><i>Single Local Plan. However, account also needs to be taken of the site's location within the AONB in landscape of national and local significance. Site is unsuitable as its size would lead to major development (of over 10 units) in the AONB.</i></p> <p>The NPPF states in Paragraph 116 that "<i>Planning permission should be refused for major developments in these designated areas <u>except in exceptional circumstances and where it can be demonstrated they are in the public interest</u></i>" (our emphasis). Clearly this is not a development management decision and so the local plan provides the opportunity to justify both the exceptional circumstances and the public interest tests. The same requirement applies to Green Belt; however, the same policy approach has not been applied in the SHLAA otherwise all Green Belt sites would also be considered unsuitable.</p> <p>The presence of an AONB designation, should not immediately mean a site is dismissed, otherwise settlements located entirely in the AONB would never be able to grow sustainably. The local authority has interpreted national policy incorrectly and applied a development management provision to a local plan process. Exceptional circumstances clearly do apply when looking to accommodate housing need, especially when looking to meet identified housing need and this is something which is in the public interest, otherwise the local authority would not be undertaking the exercise of consulting on a local plan.</p> <p>Furthermore, the site at Pea Lane is located right on the edge of the AONB and adjoins existing development, therefore potential impact will be minimised as the site already has an urban character.</p>
Include files	
Number	Question 11
ID	LPIO21667
Full Name	Mr John Monk
Company / Organisation	
Position	
Agent Name	Mr Nick Shute
Company / Organisation	Nick Shute Associates
Position	Planning and regeneration consultancy
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p><u>Response:</u></p> <p>The Issues and Options Report states that there may be some greenfield sites that could be developed. It also recognises that many greenfield sites are covered by other planning designations</p> <p>– such as the Green Belt, or landscape and environmental designations, such as the Chilterns Area of Outstanding Natural Beauty (AONB) and Wildlife Sites.</p>

	We agree with this approach, but suggest that in allocating greenfield sites for development, greater priority should be given to suitable sites that are not subject to Green Belt or AONB designations.
Include files	
Number	Question 11
ID	LPIO21684
Full Name	Countryside Properties (UK) Ltd
Company / Organisation	C/O Bidwells
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"> • CPUK agrees with the general approach detailed for site selection set out in The Plan; considering brownfields sites first, but also with recognition for a requirement the greenfield sites to contribute to delivery of growth is supported. • There is some concern over the level of detail provided with regards to site selection; there is not a clear methodology for how sites have been discounted, or carried forward for further consideration. • The SHLAA offers some information on this process, however, there are inconsistencies between how sites are assessed, and there is also not a clear process given to how the sites selected for inclusion in the site assessment schedule over others that were discounted. • A key concern also, is that sites that come forward through the current Call for Sites process will not be given fair consideration over those already considered within the SHLAA, or The Plan itself. • CPUK strongly suggest a clear site assessment methodology is published, that provides clear site assessment criteria and is updated to include new sites put forward through the ongoing call for sites submission.
Include files	
Number	Question 11
ID	LPIO21712
Full Name	Roger Saller
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>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. 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>Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a number of years should not be ignored – including the possibility of a properly planned new Garden Town.</p> <p>BRAG response</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large sites of 3000+ offer the best opportunity to provide the necessary additional infrastructure • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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 • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns • Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper
<p>Include files</p>	
<p>Number</p>	<p>Question 11</p>
<p>ID</p>	<p>LP1021755</p>
<p>Full Name</p>	<p>Elizabeth Hamilton</p>

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Paragraph 5.4.11 makes no mention of substantial areas of brownfield in Maylands Avenue and other areas elsewhere in Maylands, which could be redeveloped with housing. In addition there is no mention in this section of empty space over town centre shops and other ground floor premises, or the potential for buildings used as offices or in other uses currently to be converted to residential.</p> <p>Paragraph 5.4.16 refers to the Schedule of Site Appraisals, but the Schedule only includes Green Belt sites, with no brownfield or other types of potential development sites referred to above.</p>
Include files	
Number	Question 11
ID	LPIO21787
Full Name	Sarth Ltd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	An approach which prioritises previously developed land is supported. This should also consider the relative sustainability and environmental benefits of considering retention of sites in their existing use and the relative advantages of them being put to alternative, potentially more sustainable uses, over the plan period.
Include files	
Number	Question 11
ID	LPIO21792
Full Name	Capital and Regional plc.
Company / Organisation	Capital & Regional Plc
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"> Hemel Hempstead is assumed to have capacity for approximately 10,000 new homes over the plan

	<p>period. Greenfield sites are suggested to accommodate some of this accommodation.</p> <ul style="list-style-type: none"> • C&R is keen to explore the capacity of the town centre for accommodating new residential uses. This would involve new development that increased density, scale and building HHTC is a highly accessible, brownfield location with capacity for accommodating additional housing. Air rights development could meet particular market needs (eg Build to Rent) as well as reducing the reliance on greenfield urban extensions to meet housing requirements. • The IOD envisages delivery of between 600 and 800 additional housing units in HHTC: there is scope for increasing this figure with more detailed capacity
Include files	
Number	Question 11
ID	LPIO21800
Full Name	Capital and Regional plc.
Company / Organisation	Capital & Regional Plc
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"> • The IOD sets out three options for accommodating growth in the borough – a focus on three towns, a greater focus on Hemel Hempstead, or more evenly spread across the borough • It is C&R's view that HHTC can accommodate significant growth for new homes and Further information regarding infrastructure requirements and the capacity of the town centre for accommodating growth can be discussed as the capacity and scope develops.
Include files	
Number	Question 11
ID	LPIO21814
Full Name	Professor Jim McManus
Company / Organisation	Public Health Service (HCC)
Position	Director
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The Sustainability Appraisal identifies a range of health and wellbeing-related issues (air quality, general health

	<p>and wellbeing, transport, housing etc.) which we fully support.</p> <p>The assessment of these issues against the proposed growth options suggests there will likely be positive and negative effects, of which none are considered to be significant. Whilst we don't disagree with these conclusions, we would ask you to consider our view that at such an early stage in the process it would be remiss for these issues not to be considered further.</p> <p>Undertaking a Health Impact Assessment⁴ of the growth options as part of the Local Plan preparation would address these issues in more detail. As stated above, we would also ask that the Local Plan should set out a policy requirement that all development proposals undertake a Health Impact Assessment at an early stage – and that this should be done in parallel with other required tools used to assess the likely effects of the development when judged against reasonable alternatives.</p>
Include files	
Number	Question 11
ID	LPIO21824
Full Name	W Lamb Ltd
Company / Organisation	W Lamb Ltd
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"> The Council's broad approach to selecting sites set out in paras 5.4.1 to 5.4.16 is broadly supported. It is correct that brownfield sites should be fully explored first before considering development on greenfield or Green Belt land. Nevertheless, the Council is also correct in its conclusion that insufficient brownfield sites exist to fully meet the Borough's future growth needs, or indeed any unmet need from neighbouring authorities. As a significant number of brownfield sites have already been redeveloped, the Council will be increasingly reliant on the development of greenfield sites to deliver new development, and the Council's acknowledgement of this at para. 5.4.13 is supported. For the reasons discussed in response to Question 9, it is recommended that the Council update their Green Belt Assessment to remove reference to a Landscape Appraisal, to ensure the methodology is robust.
Include files	
Number	Question 11
ID	LPIO21878

Full Name	Louis Quail
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 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"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns.

	<ul style="list-style-type: none"> Gardens are “Greenfield” sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LPIO21946
Full Name	Thomas and Margaret Ritchie
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 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: Policy CS1 of the Core Strategy states that “Any new development should: (i) be based on the neighbourhood concept; (ii) provide for its own infrastructure; and (iii) support relevant town wide ”</p> <p>This policy also states: “The market towns and large villages will accommodate new development for housing, employment and other uses, provided that it: A) is of scale commensurate with the size of the settlement and the range of local services and facilities; B) helps maintain the vitality and viability of the settlement and the surrounding countryside; C) causes no damage to the existing character of the settlement or its surrounding countryside; and D) is compatible with policies protecting the Green Belt and Rural Area”</p> <p>Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted and Northchurch (1180 for 2006 – 2031) could not be sustained on infrastructure grounds. The market towns and large villages were identified as Areas of Limited Opportunity. In Table 1: Settlement Hierarchy of Core Strategy it is stated that “The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs.”</p> <p>Significant Green Belt release on the edge of the Berkhamsted and Northchurch settlement will clearly breach these policy assurances.</p> <p>We note again the Inspector’s Report to Dacorum Borough Council [July 2013, Q9 for the reference no.]</p>

which states, with reference to market towns, “...However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.” para 39]

It is illogical to exclude large sites in excess of 3000. Large sites of 3000 or more should be included in the assessment as they provide the best opportunity to provide the necessary additional infrastructure.

The current household build rate per annum in Berkhamsted and Northchurch is significantly above target, indeed at the current rate most of the estimated target capacity (1180) will be deployed by 2020 – that is 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing the allocation of development numbers across the Borough and site options.

The cumulative impact of small scale developments, including windfall, on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. For example the construction of 100 dwellings as windfall over a number of years leads to the same infrastructure burden as an allocated site of 100. An assessment of the infrastructure requirements arising from a steady accumulation of “small sites” is needed, with a view to estimating future needs.

We support the maximisation of brownfield sites for development. However, their use should be accompanied by an assessment of their impact on infrastructure.

Gardens are “Greenfield” sites and development should be discouraged as indicated in the Government white paper.

We strongly support development of brownfield sites before Green Belt sites are considered. However, this objective is contradicted and compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years).

The inclusion of higher density developments in appropriate areas of Hemel Hempstead is not addressed in any detail in the proposed approach. More emphasis on e.g. taller buildings in appropriate areas will enable higher urban capacities and reduce pressure on the Green Belt.

Include files	
Number	Question 11
ID	LPIO21992
Full Name	Waterside Way
Company / Organisation	Waterside Way Sustainable Planning Ltd
Position	

Agent Name	Mr Stephen Harris
Company / Organisation	Emery Planning Partnership
Position	Senior Consultant
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes
Include files	
Number	Question 11
ID	LPIO22011
Full Name	Millbank Land
Company / Organisation	Millbank Land
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>The site at Bulbourne Road extends to 1.4ha and has an indicative capacity for in the region of 36 residential units and on this basis can be allocated for development in line with the proposed approach.</p> <p>As correctly outlined, the Council should seek plan for a variety of sites over the plan period to ensure a supply of sites and housing is maintained over the duration of the plan to meet local housing needs. Strategic scale sites typically have long lead-in times and often require infrastructure to be delivered up-front, as a result they may not begin to deliver housing until the later end of the plan period. Smaller scale sites, such as the subject site at Bulbourne Road, should be allocated to ensure the plan is positively prepared in line with the requirements of the NPPF and meets the requirements of paragraph 47.</p> <p>The site is available, suitable and achievable. There are no obvious barriers to delivery; the site is not dependent on the delivery of infrastructure. On this basis, the site could come forward for development in the next five years.</p> <p>While the Council seeks to prioritise brownfield sites, the availability of these sites is falling as they have been the focus for development in recent years. In the context of rising levels of need, there will therefore be a requirement to identify greenfield sites to meet future needs. Greenfield sites should be considered on their merits as part of the plan making process and planning designations such as Green Belt should not be considered to be an absolute constraint particularly, if the site is assessed as sustainable when measured against all other planning considerations.</p>
Include files	
Number	Question 11

ID	LPIO22026
Full Name	Gallagher Estates
Company / Organisation	Gallagher Estates
Position	
Agent Name	Mrs Hanna Staton
Company / Organisation	Pegasus Group
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>It is agreed that there is insufficient brownfield and greenfield land available to meet the Borough's growth needs and that land within the existing Green Belt and wider countryside will need to be identified and allocated for development. Such sites will need to be available, suitable and achievable, as acknowledged by the Council in paragraph 5.4.6.</p> <p>It is strongly agreed that the Council should plan for a variety of sites over the plan period. It is appropriate to ensure that, as well as identifying the right amount of land, there is sufficient variety in the types of sites (brownfield, greenfield, Green Belt) identified, reflecting different sizes, in a range of locations. This variety in provision will allow the best opportunity for multiple sites to come forward at the same time without market constraint and hence ensuring delivery targets are met. In addition, this approach will also provide market choice to existing and arising households looking to move into a new home in the Borough, which will have wider social benefits (i.e. allow families to live nearby one another and provide an opportunity to diversify existing communities through providing alternative homes to the existing housing stock).</p> <p>It is pleasing that the Council appears to have taken a structured approach to selecting sites for development through its draft Schedule of Site Assessments, SHLAA and Green Belt reviews. It is disappointing, however, that there is not a table summarising the potential yield from each location to determine the share of homes available for each location. It is important that the final selection of sites is soundly based on the evidence produced and that an option is not chosen that places undue constraints on sustainable development in the Borough.</p> <p>It is also important that enough sites are selected and allocated for development to ensure that unforeseen delays at one or more sites do not threaten the delivery of the housing, jobs, facilities and services the Borough needs.</p>
Include files	
Number	Question 11
ID	LPIO22067
Full Name	MCJ Trust
Company / Organisation	MCJ Trust

Position	
Agent Name	Samuel Dix
Company / Organisation	Smith Jenkins
Position	Senior Planner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Our client does not agree with the proposed approach to selecting sites. The use of alternative assessment approaches (i.e. the regular SHLAA process for small sites but specific appraisals for sites larger than 50 dwellings) is inconsistent and based on an arbitrary threshold.</p> <p>We consider that each site should be considered via the same site appraisal proforma. We have therefore completed the relevant template for our client's land at Flaunden, which is appended to this letter. This confirms that it would represent sound planning benefits once the issues of Green Belt and settlement hierarchy outlined above are addressed.</p>
Include files	
Number	Question 11
ID	LPIO22076
Full Name	Kings Langely & District Residents Association
Company / Organisation	Kings Langley and District Residents association
Position	
Agent Name	Jane Terry
Company / Organisation	Vail Williams
Position	Partner
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We disagree with the approach to only include sites with a capacity of 10 plus units or a minimum of 0.3 ha in area as specific allocations with plan. The approach should be to focus on the quality and suitability of sites rather than on size alone. Kings Langley has many smaller brownfield sites in and around the village which could be brought forward in preference to building on the outer edge of the settlement.</p> <p>KL&DRA disagree with the approach to selecting sites because the approach places reliance on the incorporation of Green Belt sites which would consequently lead to an amendment in the Green Belt designation. Local authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:</p> <ul style="list-style-type: none"> • Making effective use of suitable brownfield sites and the opportunities offered by estate regeneration; • The potential offered by land which is currently underused, including surplus public- sector land where appropriate;

- Optimising the proposed density of development; and
- Exploring whether other authorities can help to meet some of the identified development requirement and then only with the support of local people

Dacorum Borough Council has not explored the above options and therefore no greenfield and Green Belt sites should be released or allocated. Dacorum Borough Council must look closer into the potential for delivering housing need through making most efficient and effective use of brownfield sites across the Borough but focussed on the town of Hemel Hempstead, and market towns of Berkhamsted and Tring.

KL&DRA are aware of potential opportunities on brownfield site alternatives which have not been robustly investigated by Dacorum Borough Council (including small windfall sites and cross-boundary sites involving the Duty to Cooperate). We have carried out a quick review and identified the following brownfield sites in Kings Langley and Hemel Hempstead (and one in Tring).

- Skyline Roofing, The Nap WD4 8ES - builder's yard to the rear
- Chiswell Pools, 126 Hempstead Rd, WD4
- Alpine Press, Station Rd, WD4
- A T Olivers, Home Park Works, WD4 8LW
- Druglink, Trefoil House, Red Lion Lane, HP3 9TE
- Red Lion Pub, Red Lion Lane, 56 London Road HP1 3BD
- DBC garages in Barnes Rise WD4 8AN, Rucklers Lane, Waterside and Great Park
- Pillings Volvo, 28 Rucklers Lane, WD4 8AU
- Trade Link used cars, 20 Church Lane WD4 8JU
- Chipperfield Garden Scene (garden centre), Chapel Croft, WD4 8EG
- 167 London Road, Apsley, Hemel Hempstead, HP3 9SQ
- 21 Bellgate, Hemel Hempstead, HP2 5SB
- 2 Kimps Way, Hemel Hempstead, HP3 8EN
- Charter Court, Kings Langley, WD4 9HR
- 100 High Street, Hemel Hempstead, HP1 3AQ
- Maylands Avenue, Hemel Hempstead
- Former gasometer, London Road, HP3 9AB
- 353 London Road, Hemel Hempstead
- Hemel Hempstead Station
- 27 Standing Rise, Hemel Hempstead
- Link Road, Hemel Hempstead
- Pennine Way, Hemel Hempstead
- Former Buncefield Depot
- Three Cherry Trees Lane, Hemel Hempstead Industrial Estate
- Spencer's Park, Crown Land, North Hemel Hempstead
- Westside, London Road, HP3 9TD
- ASM Recycling, Railway Terrace, WD4 8JE
- Gaywood Fishery, Station Footpath, WD4 8DZ
- Kings Langley Building Supplies, Primrose Hill, WD4 8HR
- Langley Wharf, Railway Terrace, WD4 8JE
- Sunderlands Yard, Church Lane, WD4 8JU
- BT Exchange, The Nap, WD4 8ET

	<ul style="list-style-type: none"> • Land at Runways Farm, Upper Bourne End Lane, Hemel Hempstead, HP1 2RR • 7- 9 High Street, Tring, HP23 5AH <p>A Map illustrating the location of each of the above sites is to be found at Appendix B.</p> <p>The above list is not comprehensive and there are likely to be other brownfield sites as well. However, this exercise could clearly be replicated in the other main towns with Tring and Berkhamsted also yielding a considerable amount of additional brownfield land suitable for residential development which would contribute to minimising any residual requirement for greenfield, Green Belt. Redevelopment should be at the highest density appropriate to the site and surroundings.</p> <p>The KL&DRA are not suggesting that any particular site should be built on but that their potential for redevelopment or conversion should be thoroughly reviewed before the allocation of any greenfield, Green Belt sites. We do not consider that a sufficiently robust review has so far taken place.</p> <p><u>QUESTION 11 Approach to Site Selection - Summary Representation and Response Sought:</u></p> <p>Dacorum Borough Council has not explored the above options and therefore no greenfield or Green Belt sites should be released or allocated. Dacorum Borough Council must look closer into the potential for delivering housing need through making most efficient and effective use of brownfield sites across the Borough but focussed on the town of Hemel Hempstead and the market towns of Berkhamsted and Tring.</p>
Include files	Jane Terry - REPS - Appendicies A B C - Response to DBC Local Plan Issues and Options Consultation FINAL - Kings Langley - Appendicies A B C.pdf
Number	Question 11
ID	LPIO22099
Full Name	Crest Nicholson
Company / Organisation	
Position	
Agent Name	Sarah Moorhouse
Company / Organisation	Lichfields
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>We agree with the broad approach to selecting sites which plans for a variety of sites over the plan period. However we have major concerns regarding the methodology, analysis and conclusions drawn within in the assessment of sites set out in the SA Schedule of Site Appraisals (October 2017). We do not consider that the analysis undertaken to date would underpin a “sound” Local Plan.</p> <p>Our full response is set out in Section 4.0 of the Land at Blegberry Gardens, Berkhamsted (Site Be- h6) -</p>

	Representations to Dacorum's New Local Plan: Issues and Options (Nov 2017) document by Lichfields on behalf of Crest Nicholson Chiltern.
Include files	Sarah Moorhouse Crest Nicholson-15426 Land adj. to Blegberry Gdns, Berkhamsted Reps (13.12.17).PDF
Number	Question 11
ID	LPIO22127
Full Name	Mrs Hayley 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 11
ID	LPIO22171
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 11
ID	LPIO22215
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 11
ID	LPIO22492
Full Name	Mr & Mrs Lisa-Lotte & Henrik Hansen
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 below our response to the new Local Plan consultation. I fully support Brag's response on this matter (see below)</p> <ul style="list-style-type: none"> • It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure. • Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure. • This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!). • 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. • The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. • Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper.
Include files	
Number	Question 11
ID	LP1022542
Full Name	Mrs C Longbottom
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 support all answers and comments to the Issues & Options Consultation document noted on the Berkhamsted Town Council website</p> <p>Policy CS1 of the Core Strategy states that</p> <p>“Any new development should:</p> <ul style="list-style-type: none"> • be based on the neighbourhood concept; • provide for its own infrastructure; and • support relevant town wide ” <p>This policy also states:</p> <p>“The market towns and large villages will accommodate new development for housing, employment and other uses, provided that it:</p> <ol style="list-style-type: none"> 1 is of scale commensurate with the size of the settlement and the range of local services and facilities; 1 helps maintain the vitality and viability of the settlement and the surrounding countryside; <ol style="list-style-type: none"> 1 causes no damage to the existing character of the settlement or its surrounding countryside; and 1 is compatible with policies protecting the Green Belt and Rural ” <p>Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted and Northchurch (1180 for 2006 – 2031) could not be sustained on infrastructure grounds. The market towns and large villages were identified as Areas of Limited Opportunity. In Table 1: Settlement Hierarchy of Core Strategy it is stated that “The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs.”</p> <p>Significant Green Belt release on the edge of the Berkhamsted and Northchurch settlement will clearly breach these policy assurances.</p> <p>We note again the Inspector’s Report to Dacorum Borough Council [July 2013, Q9 for the reference no.] which states, with reference to market towns, “...However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.” para 39</p> <p>It is illogical to exclude large sites in excess of 3000. Large sites of 3000 or more should be included in the assessment as they provide the best opportunity to provide the necessary additional infrastructure</p> <p>The current household build rate per annum in Berkhamsted and Northchurch is significantly above target, indeed at the current rate most of the estimated</p>

	<p>target capacity (1180) will be deployed by 2020 – that is 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing the allocation of development numbers across the Borough and site options.</p> <p>The cumulative impact of small scale developments, including windfall, on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. For example the construction of 100 dwellings as windfall over a number of years leads to the same infrastructure burden as an allocated site of 100. An assessment of the infrastructure requirements arising from a steady accumulation of “small sites” is needed, with a view to estimating future needs.</p> <p>We support the maximisation of brownfield sites for development. However, their use should be accompanied by an assessment of their impact on infrastructure. Gardens are “Greenfield” sites and development should be discouraged as indicated in the Government white paper.</p> <p>We strongly support development of brownfield sites before Green Belt sites are considered. However, this objective is contradicted and compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years).</p> <p>The inclusion of higher density developments in appropriate areas of Hemel Hempstead is not addressed in any detail in the proposed approach. More emphasis on e.g. taller buildings in appropriate areas will enable higher urban capacities and reduce pressure on the Green Belt.</p>
Include files	
Number	Question 11
ID	LPIO22612
Full Name	Mr & Mrs Mehew
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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:

Policy CS1 of the Core Strategy states that

“Any new development should:

- be based on the neighbourhood concept;
- provide for its own infrastructure; and
- support relevant town wide ”

This policy also states:

“The market towns and large villages will accommodate new development for housing, employment and other uses, provided that it:

- 1 is of scale commensurate with the size of the settlement and the range of local services and facilities;
- 2 helps maintain the vitality and viability of the settlement and the surrounding countryside;
- 3 causes no damage to the existing character of the settlement or its surrounding countryside; and
- 4 is compatible with policies protecting the Green Belt and Rural”

Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted and Northchurch (1180 for 2006 – 2031) could not be sustained on infrastructure grounds. The market towns and large villages were identified as Areas of Limited Opportunity. In Table 1: Settlement Hierarchy of Core Strategy it is stated that “The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs.”

Significant Green Belt release on the edge of the Berkhamsted and Northchurch settlement will clearly breach these policy assurances.

We note again the Inspector’s Report to Dacorum Borough Council [July 2013, Q9 for the reference no.] which states, with reference to market towns, “...However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough’s main town.” para 39]

It is illogical to exclude large sites in excess of 3000. Large sites of 3000 or more should be included in the assessment as they provide the best opportunity to provide the necessary additional infrastructure.

The current household build rate per annum in Berkhamsted and Northchurch is significantly above target, indeed at the current rate most of the estimated

	<p>target capacity (1180) will be deployed by 2020 – that is 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing the allocation of development numbers across the Borough and site options.</p> <p>The cumulative impact of small scale developments, including windfall, on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. For example the construction of 100 dwellings as windfall over a number of years leads to the same infrastructure burden as an allocated site of 100. An assessment of the infrastructure requirements arising from a steady accumulation of “small sites” is needed, with a view to estimating future needs.</p> <p>We support the maximisation of brownfield sites for development. However, their use should be accompanied by an assessment of their impact on infrastructure.</p> <p>Gardens are “Greenfield” sites and development should be discouraged as indicated in the Government white paper.</p> <p>We strongly support development of brownfield sites before Green Belt sites are considered. However, this objective is contradicted and compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years).</p> <p>The inclusion of higher density developments in appropriate areas of Hemel Hempstead is not addressed in any detail in the proposed approach. More emphasis on e.g. taller buildings in appropriate areas will enable higher urban capacities and reduce pressure on the Green Belt.</p>
Include files	
Number	Question 11
ID	LPIO22688
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	<p><i>Question 11 – Do you agree with the proposed approach to selecting sites?</i></p> <p>We support the approach of maximising development on brownfield sites and continuing renewal of Hemel Hempstead.</p> <p>It needs to be recognised that the lower the density of development on urban brownfield sites, the more greenfield development must come forward. Similarly, spreading development at lower density across more</p>

sites risks a more diffuse investment in improving infrastructure and a more car dependent form of development which is not consistent with the Vision put forward.

Whether brownfield or greenfield, failing to allocate and deliver more homes on the most accessible and sustainable sites (or those that can be made so) will ultimately mean this development has to be put in less accessible and sustainable locations in transport terms, and providing new or improved infrastructure will potentially be more difficult to achieve in financial and viability terms; this means the transport impacts are likely to be more difficult to manage.

In relation to paragraph 5.4.3, large sites may take a long time to come forward. Yes, these sites may require significant new infrastructure – appropriate timescales needed for planning infrastructure, services and facilities need to be incorporated to ensure development that comes forward is sustainable.

The Natural, Historic & Built Environment Advisory Team recommends that the historic environment is a consideration in the approach to selecting sites. This is because heritage assets with high significance may be a constraint on development. This can be the case if they are designated, but also if they are undesignated but it has been demonstrated that they have equivalent significance to scheduled monuments (NPPF paragraph 139). It is possible for currently unknown heritage assets to be present which may have this level of significance.

With regards to the proposed approach to brownfield sites, developing at greater densities and / or heights presents some key challenges such as overshadowing, impacts upon the microclimate (urban heat, wind tunnelling etc.), and increased human activity and pressures within a smaller area.

Policies and guidance to promote urban Green Infrastructure interventions can help address some of these key challenges and include street trees and planting to provide urban cooling, air, soil and water regulation, sustainable drainage systems e.g. rain gardens, green walls and green roofs (as public open space, private gardens, allotments, or wildlife areas/stepping stones) multifunctional open space as temporary flood storage, play and recreation space.

With regards to the proposed approach to Greenfield sites, key challenges include the impact upon landscape character and visual amenity. The location, layout and design of any new settlements or settlement extensions should be informed by landscape and visual impact assessments, landscape sensitivity and capacity studies, and site surveys and analysis, to ensure that development can be accommodated without causing unacceptable harm to landscape character, important landscape features, and visual amenity.

Include files	
Number	Question 11
ID	LPIO22799
Full Name	Mr Patricia Wheway

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 disagree with the proposal to only include sites with a capacity of 10 units or 0.3h. The approach should be to concentrate on suitable sites.</p> <p>Every major project should provide some consideration of the costs involved in different options, including the costs of additional infrastructure developments to provide improvements to transport links, education, health services, water and, drainage.</p> <p>Improvements are already urgently needed in many areas, for example to the transport infrastructure where existing peak hour congestion can only be made worse by new building, resulting in lower quality of life for all residents.</p>
Include files	