

Appendix 2g

Responses by Consultation point

25-Sustainability Appraisal

Pages 2 to 443

26-Evidence Base

Pages 444 to 964

27-National Planning Policy Guidance

Pages 965 to 1502

28-Any Other Comments

Pages 1503 to 2275

25 Sustainability Appraisal responses

Title	Question: Sustainability Appraisal
ID	EGS83
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	The Appraisal covers all the elements of the strategy plan. As a lay person I found it a bit over the top to digest and took a long time to understand. I feel that there is an immense body of literature to get though and that maybe a closing period extention may give other people time to review at leisure rater than in haste. It has taken me between 3 to 4 hours aday for the past week just to get this far.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS97
Person ID	1255447
Full Name	Andrew Sparrow
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	No

* No	
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS265
Person ID	1207707
Full Name	Mike Beavington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS336
Person ID	1259868
Full Name	Philippa Baker
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	Dacorum have declared a climate emergency. How can they go against their own statement and suggest this huge decrease of green belt land? Mindless distruction.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS394
Person ID	1260058
Full Name	Redbourn Parish Council
Organisation Details	
Agent ID	1260042
Agent Full Name	David Mitchell
Agent Organisation	Redbourn Parish Council
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS494
Person ID	1258240
Full Name	Adele Giles
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS573
Person ID	1261023
Full Name	Richard Brash
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions. In these circumstances, there would be no option but to extract additional water from the chalk aquifer which in turn would cause further damage to the Borough's precious chalk streams. New supplies of water are not likely to be possible until after 2030.</p> <p>The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.</p> <p>The inevitable increase in traffic arising from such large scale development will put huge pressure on already full roads. The proposed new road north of Hemel could have adverse unforeseen consequences on villages to the north and west of Hemel.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS645
Person ID	1261183
Full Name	Oliver Fairfull
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	<p>Growth at any cost is not the answer. The "vision" mentions sustainability throughout, but none of this growth is sustainable. Overloading areas with a population it cannot support will be detrimental to the countryside, farm land, green space and the lives of those who have chosen to live in the area. Steady and monitored growth means strategic thinking and adapting to changing conditions. Build the infrastructure and only then, grow in line with that. The policy as it stands is to build at a rapid rate, seemingly at any cost.</p> <p>My experiences are of living in Tring, but it is likely the sentiment is echoed all through the Borough. For example, it is already hard to get a doctors/dentist appointment. Increase healthcare capacity, then grow the community.</p> <p>The employment growth you are forecasting is simply a proposal and not a reality. We simply can't know what the economic situation will be – some of your plan may succeed, but others will likely falter. Build the economy, then build the housing.</p> <p>Tring is a commuter town and a (significant) proportion of new inhabitants will likely commute to London on a trainline already at capacity. Station car parks are full before rush hour is over - where is the proposal to increase that capacity? You mention building a better link between Tring and the station, build it first and demonstrate that it works. What is currently in place is dangerous for pedestrians, cyclists and drivers. A small cohort will cycle in any weather, many (including me!) will not and will resort to driving. You also can't change the existing road infrastructure; Tring high street is extremely narrow. A single vehicle stopping (eg deliveries, mail van) backs up traffic. Increasing housing in Tring by such radical numbers will result in far more congestion and pollution – flying directly in the face of your environment plan. It's easy to demonstrate now that people drive to the town and do not walk, and an increase in population will result in increased traffic, particularly as the green belt sites are some distance from the town centre.</p> <p>Residents in this area should not be made to pay for short sighted thinking. The proposal to build vast numbers does one thing; makes developers very rich. They will build the standard "cookie cutter" houses, with minimal space between properties, minimal parking and a minimal green space. Once they have been paid, they will leave and having irreparably changed the face of the town, we, and future generations will be left to suffer the consequences.</p> <p>These new estates seen all over the country are the modern equivalent of tower blocks build in the 60s. We will look back in 50 years and wonder why anyone thought they were a good idea. The example to the west of Tring is a key demonstration of this. Decorating the house that face the main road with a pretty stone façade is just that, a façade. Look within the roads and you see narrow houses, squashed in at the edge of town, forcing people to drive to town. Maximising profits for developers, ignoring the real needs of the town inhabitants.</p>

In the original "vision", I believe the proposed number of houses in Tring was between 600 and 1100, which seemed absurdly high. You have now raised this to 2,731 (an odd number, how can you be so exact? Presumably because this was calculated by a formula rather than rationale thought) but cannot see any justification for that alarming increase. I made the same points then, grow the infrastructure and then grow the housing stock, not the other way around. Targets are not the answer. Destroying green belt and farm land is not the answer. Once you have made these mistakes, we cannot go back.

This may be mandated from Westminster, but your job as our local representatives is to fight back. I am not anti-growth – our population is expanding, but we need to grow in a sustainable, controlled way, not mandating the growth of a town by 40-50%. I spent many hours reading through the 2017 documents and responding. Now to find out that you are “doubling down” on expansion at such a rate is very disheartening. Many people do not have the time to read through such lengthy document and reply but their lack of response should not be taken as de facto approval. We love where we live. Please, take the time to make the right choice and not put this monstrosity of a plan into action.

Included files

Title Question: Sustainability Appraisal

ID EGS663

Person ID 1261122

Full Name Mark Slade

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Sustainability Appraisal comment

Included files

Title Question: Sustainability Appraisal

ID EGS761

Person ID 211245

Full Name Ms Jody Conibear

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS830
Person ID	1260562
Full Name	DAVID WILDE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	Dont know. The documents are so extensive the general public cannot be expected to read all of
Included files	
Title	Question: Sustainability Appraisal
ID	EGS1086
Person ID	1261690
Full Name	Mr Trevor Putman
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>As regards the Interim Sustainability Report, the application of the criteria to the Tring sites as recorded in the tables understates the adverse features ie Biodiversity, shows a lack of understanding of how and the extent to which these areas are currently used eg Climate Change/Air Quality, fails to highlight that the soil is Grade 2 quality and will be lost, fails to bring out the value of the natural assets eg Landscape and Historical features of the locations eg Historical Environment. The criteria should be applied again, the results reviewed and the adverse results given their proper weight – then decisions made.</p> <p>This failure to apply the criteria correctly has contributed to a wrong choice of Option. The concentration of development on the 3 Towns has no doubt been strongly influenced by landowners/farmers and developers interests, benefits and preferences BUT it should be a choice made objectively BY THE COUNCIL for the benefits of residents, not that small group of people. The spread of the burden of extra houses should be greater and the sites more plentiful and smaller so as not to damage the environment and existing residents interests. This plan is aimed at future residents with little recognition of present residents. We are all only the present custodians of our environment – so we must take the greatest care of it for those that follow.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS1177
Person ID	1143779
Full Name	Ms Julia Marshall
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS1249
Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Table 4-1: Key sustainability Issues and Opportunities (Page 16)</p> <ul style="list-style-type: none"> The following is identified as a 'key sustainability issue': <i>'Ashridge SAC/SSSI, Tring Park, Tring Reservoirs and the Grand Union Canal are all reported to be experiencing visitor pressures. As the urban population increases, pressures on access to the countryside and these key attractions will increase.'</i> Yet there is no further mention of these in the Plan and no proposed mitigating action. <p>Section 5.5 'The Council's preferred approach' (Pages 42- 45)</p> <ul style="list-style-type: none"> We disagree strongly with the conclusions reached with respect to Tring on several of the stated considerations. The conclusions reached are not consistent with the reasons given, place insufficient emphasis on mitigating negative aspects and contradict other stated conclusions – as expanded upon in the following sections. Page 43. A stated consideration is <i>'minimising, where possible, adverse impacts on the highway network and seeking to maximise opportunities for supporting sustainable modes of travel'</i>. As noted elsewhere in this response, the options for both road connections and sustainable travel have NOT been adequately explored. In particular for a Tr03/Tr02, north–south road, connectivity has not been considered beyond vague notions that something will be required. This is nowhere near concrete enough. On page 46, <i>'[the Council] considers the allocation of 1,400 homes at East of Tring will enable significant amounts of public open space to be provided, including a new public park of around 20 hectares on land classified as Grade 2. The Council considers that these requirements mitigate the impact that development would have on this particular</i>

objective. Twenty hectares is less than one sixth the area of the existing Tring Park, which elsewhere in the same document (Page 16) is already reported to be suffering from ‘visitor pressures’. The provision of 20 hectares of public park is wholly inadequate, especially coupled with the complete lack of further mitigating action for developing on Green Belt land and the absence of any joined-up plan for linking other green spaces impacted by the proposed developments.

Included files

Title Question: Sustainability Appraisal

ID EGS1284

Person ID 1145427

Full Name Mr David Glenister

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION: Sustainability Appraisal comment The SA conclusion 7.1 states that the Council have been successful in achieving their SA objectives “by maximising the levels of development in the existing urban areas the amount of greenfield land needed will be minimised, thereby reducing the scale of these effects.” But DBC’s Plan does not reflect this statement. The facts do not support that conclusion. Excluding windfall, only 23% of the planned development to 2050 is on Brownfield sites, leaving 77% to be built on Green Belt or Greenfield sites (64% Green Belt). This is not a ratio that in anyway suggests that the DBC have effectively analysed urban capacity correctly or maximised “the levels of development in the existing urban areas”. It is noted that CPRE Herts have come to the same conclusion that DBC underestimate potential brownfield regeneration opportunities: “The proposed local plan fails to take into account the impacts of the coronavirus pandemic and recently expanded permitted development rights, both of which are likely to result in much greater conversion of commercial space (especially office and retail) to residential use. The potential for such windfall provision of housing throughout the borough is likely to be much higher than that identified in the proposed plan. As a result, such a windfall many of the proposals for development on Green Belt and greenfield sites outside of existing towns and villages are likely to be unnecessary. Dacorum Borough Council should consider promoting mixed use living spaces in town centres. This has the potential to provide much needed affordable housing and provide a sustainable transport solution for local communities. The plan lacks a vision for the longterm future of retail and leisure parks that create better people friendly places and that are not designed around cars. In the light of recent events (Covid and Brexit) and trends in the retail sector, the

government has announced a new approach to promotion of redevelopment and changes to the way our urban land is used, in particular the reconsideration of how much, and which existing retail, industrial and commercial land and premises can be more efficiently and sustainably used in a different way. The now-expanded permitted development rights allow commercial space to be converted to residential (as well as adding additional storeys on top) without need for planning permission. This new opportunity appears to have been ignored in the preparation of the proposed plan. It would seem DBC are failing to plan to maximise “the levels of development in the existing urban areas. The Local Plan must consider as a priority the Post Covid 19 Pandemic and Brexit effects, to see how they impacts of the Growth needs and requirements in the Dacorum area.

Included files

Title Question: Sustainability Appraisal

ID EGS1343

Person ID 1145350

Full Name Mr Edward Murray

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Sustainability Appraisal comment

Included files

Title Question: Sustainability Appraisal

ID EGS1376

Person ID 1262050

Full Name Mr Martin Parr

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>As outlined in my replies to Question 1 and 2 development on the scale proposed is neither sustainable nor necessary. The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <p>1. To protect, maintain and enhance biodiversity and geodiversity at all levels.</p> <p>Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000 + more people and their cats and dogs into them, cannot be done without damaging biodiversity. And putting a 10% net gain target on developers that will never be measured or achieved is just greenwash.</p> <p>2. To protect, maintain and enhance water resources (including water quality and quantity)</p> <p>Your own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already over-extracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum. There will be no water left to measure quality. You will kill the river and all the wildlife and biodiversity that depends on it - how are your developers going to offset that in their 10% net gain calculations?</p> <p>Development at the level you propose is simply not compatible with these 2 objectives.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS1523
Person ID	1262216
Full Name	George Godar
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	We have concerns about water supplies to meet the requirements of the target number on new houses, in particular the pressure on the chalk aquifers and the health of the River Gade and River Bulbourne if extraction is increased.

Comments have already been made about the risk of increased traffic density along the B440 and surrounding villages.

Included files

Title Question: Sustainability Appraisal

ID EGS1608

Person ID 1261385

Full Name stephen hearn

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment **Growth area TR06 – off Brook Street Tring**

TR06 comprises Tring Market Auctions, The Tring Local History Museum, the Fire Station and Forge Car Park.

Tring Market Auctions is located at the rear of the site of TR06 with access from Brook Street and a license to access the Forge Car Park.

The ownership of the site is divided between Tring Town Council (Auction Rooms, Museum and the Market Place *hardstanding area*), Dacorum Borough Council (Forge Car Park) and Herts County Council (The Fire Station). The Freehold ownerships make it a somewhat complicated issue should planning proceed.

In the proposal, no mention has been made for Tring Market Auctions to be included in the future plans of TR06, but mention has been made that if the site is re-developed Tring Market Auctions would be offered an alternative site in the town – where? The Auctions currently comprise about 16000 sq ft of buildings alone together with the adjoining parking areas. No detail has been provided and no mention of re-location provisions has been made. It appears the proposals are an afterthought to the Dacorum local plan. Tring Market Auctions occupy under the terms of a lease with Tring Town Council.

The History and Current use of the Site

In 1893 under the requirements of the Board of Agriculture and with the assistance of Lord Rothschild, the sale room with office was constructed in Brook Street. It was let to W Brown & Co. who conducted the first sale by auction in January 1894, since when auctions and sales have been held continually on the site for over 125 years – surely this qualifies the location to be part of Tring’s heritage.

During recent years from 1960 there has been numerous enquiries and planning applications to develop the site with offices and supermarkets together with residential, all of which have been rejected.

In 1993 the livestock auction ceased to operate leaving the chattel auction business to continue and flourish under the directorship of Stephen Hearn who took Tring Market Auctions to become independent and grow into the fine company it is today.

It now has an extensive complex of four Auction Rooms, forming one of the largest and best known venues of its type in the Home Counties.

The sales attract a very large number of vendors and buyers from Tring and the surrounding towns and villages together with an ever-growing number of people from throughout the Home Counties and Internationally. Many of the buyers represent the trade and other specialist collectors in all categories.

The auctions provide a friendly and entertaining atmosphere on sale days making it an enjoyable venue for both business and pleasure. Regularly around 500 visitors attend on viewing and sale days, many of these attending the auction visit the town shops and local attractions.

Tring Market Auctions is a unique and key component of the town's economic town centre fabric. It provides a key fulcrum for maintaining the town centre economic sustainability. Visitors to the auctions provide business for other local shops and enterprises not just on sale days but across all the sites activities, its town centre location is fundamentally linked to many other local business and the town market continued sustainability.

The auction rooms provide a unique component part of maintaining Tring Town Centres' viability and supporting Tring based economic development. If Tring is expected to grow then business, jobs and economic infrastructure growth needs to be matched, Tring Market Auctions needs to be maintained as it supports this economic ambition of the Local Plan through continued town centre provision of a business that is complementary to local shops and does not provide competition, as would the proposed supermarket.

The Saleroom operates with a permanent staff of some 20 people which includes consultants and additional part time staff during sale days. The venue is a key local employer, bringing training and development and job opportunities for local young people.

The Auction sales deal with all periods of furnishings and collectables, processing over 50,000 lots each year providing an effective and affordable house furnishing option for many local people. It has a growing importance as a recycling centre, particularly when it is estimated over 20 tonnes of furniture timber is recycled every fortnight, which supports the climate ambitions in the Local Plan.

In addition the Auction provides a key income stream to the Town Council reducing precept impact on local residents and contributing to a sustainable model of local government

The Auction provides a service to both the local community and professional organisations throughout the Home Counties and beyond.

Points of Consideration

- It is positioned on a site with a long history of auctions and marketing of stock

- It is an important asset for the Town
- The auction attracts a large number of visitors to Tring throughout the year
- It employs local townspeople
- Town Centres should reflect the distinctive characteristics of a Market Town
- The site would not lend itself as a supermarket, particularly when this proposal is unproven
- The Auction Rooms occupy a strategic position at the head of an open space and wildlife corridor which runs from the Tring Park Mansion vista through to Icknield It is very much part of the local community, supporting many of the Town's organisations and groups

Planning Matters for Consideration

- Brook Street has a notorious reputation for being dangerous in parts where it is very narrow making it often difficult for vehicles to pass
- Tring High Street has introduced traffic calming measures
- It is suggested in the development plan that a supermarket would be served with a new carpark. Bearing in mind the development would include the existing Forge Car Park, does one interpret this as denying the town parking facilities
- Recently, two large planning applications have been refused in Brook Street both in close proximity to TR06, one being the residential re-development of Market Garage and the introduction of a residential development on the North Eastern side of Silk Mill works. In both instances, the reason for refusal included over-development of the respective sites and the dangers of access to Brook Street
- The plan proposals to create new food and drink leisure uses is difficult to understand when there are currently so many retail outlets available in Tring
- It states that any re-development of the site would only be permitted once replacement facilities are provided elsewhere in the town. The only specified new location is in Growth Area TR01 (Dunsley Farm) for the Fire and Rescue There is no detail with regard to the siting of Tring Market Auctions, nor the Local History Museum.
- One can create new buildings but one cannot create history

TR06 is not a redundant site, it forms an important part of Tring Town Centre with Tring Market Auctions and the local Museum providing both business and pleasure to hundreds of people throughout the year.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS1674
Person ID	1165136
Full Name	Mr & Mrs J.D Battye
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>METHODOLOGY.</p> <p>It is clear from the volume of documents accompanying the consultation that considerable public money has been expended on and considerable input has been received from external consultants and sources. TRL has analysed each site carefully and objectively. However the assessments in their extensive analysis do not appear to have been translated into coherent policy or proposals. The scope of the work undertaken clearly allows for the consideration of sites on an individual basis and yet the options offered in the plan have been compressed into the rigid format of the Spatial Strategy at 5.2 which fails to deliver a logical and consistent result.</p> <p>The formulation of options described in the SA appendices is suspect and inconsistent. Why does DBC's preferred option (C 1) result in 1450 more houses in Tring and Berkhamsted and 1900 fewer in Hemel Hempstead, the most sustainable location, compared to option A which supposedly concentrates development in the 3 largest settlements? Why does option D (which proposes 2 new developments) result in 200 more houses in Tring and Berkhamsted but no extra homes in Kings Langley or Hemel Hempstead when compared to option C ii? Allocations have not been made on a consistent, proportionate basis.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS1719
Person ID	1262353
Full Name	L HOUSDEN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	See attached representations - it is TTC's view that the overall strategy of directing so much growth to Tring is flawed. The impact of this level of development upon the Beechwoods SAC has not been assessed. Furthermore, the information regarding existing and proposed traffic levels is not yet available.
Included files	Tring Town Council - Completed consultation Comments Form (Final).pdf
Title	Question: Sustainability Appraisal
ID	EGS1765
Person ID	406469
Full Name	Dr Stephen Douglas
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Over development that is not sustainable
Included files	
Title	Question: Sustainability Appraisal
ID	EGS1822
Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS1932
Person ID	1262553
Full Name	Henry Wallis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2035
Person ID	1262601
Full Name	Anne Smith
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	Too much change since it was completed to be sufficiently credible, eg Brexit, Covid-19 pandemic, net export of 1.3 million people
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2065
Person ID	1262738
Full Name	Alan Pierce
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2119
Person ID	1262797
Full Name	NICK TURNER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS2172
Person ID	1261286
Full Name	John Saner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
QUESTION: Sustainability Appraisal comment	The proposed development will put pressure on the water supply. The water supply in the Chilterns is fragile and any additional need to pump water from the chalk aquifer will have a deleterious effect on the Rivers Gade and Bulbourne. The inevitable increase in traffic arising from such large scale development will put huge pressure on already full roads. The proposed new road north of Hemel could have adverse unforeseen consequences on villages to the north and west of Hemel.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2185
Person ID	1262762
Full Name	Eric Dodman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have read these and my comments in other sections suffice
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2236
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Sustainability Appraisal. I don't think that the size of development in Berkhamsted is sustainable in any way due to the disproportionate size and damage to the environment that it will cause. We will lose green land that will be lost forever, increase pollution and put a strain on already stretched facilities which will be dealt with inadequately and effectively issues will have a sticking plaster stuck on them. The town is already densely populated by virtue of the fact we have hundreds of cottages tightly packed together. When they were built people didn't have cars so the streets were wide enough. That has changed and now everyone has cars which has left us with heavily congested roads. Various developments have been added to the town over the years and that has made the situation worse. The new proposed houses on the A41 side of the town will be too far for people to walk to the station and town centre and too hilly to cycle and so they will drive, more cars on the road, more pollution and congestion. On top of that more children all being driven to the various schools around the town with the increase in population this number of housing will bring. Sewage systems do not have the capacity for more sewage and we already have issues down one end of the town where it is backing up. The town has little green space left it's all been used to build on and now you propose to build on what little is left further out of the town. The parks we do have are tiny and mainly geared for toddlers. The bridle paths and woods, the bigger children cycle through and scouts hike through are what you are going to build on. No thought is given to this and a handkerchief sized park in the middle of a development is no compensation for the lost land and biodiversity. The standard trick is for parks to be promised within a development they are tiny and no replacement for the benefits for a child of being able to rove around a wood with a stick in its hand . They also generally encourage anti social behaviour as do multi story car parks and something else we now have in the town since the arrival of our car park.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2276
Person ID	1262925
Full Name	Nandipha Jordan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

**QUESTION: Sustainability
Appraisal comment**

As stated in the Sustainability Appraisal: *“any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects ... relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants”*

Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure

There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.

Biodiversity (SA Objective 1)

Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land.

Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.

Flood Risk (SA Objective 3)

SA states it has found ‘no predicted effects’ against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road, floods regularly (please see picture below taken in January 2021).

Greenhouse gas emissions (SA Objective 4)

The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

Air Quality (SA Objective 5)

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites which do not encourage car use or increase congestion;
- the creation of a robust electric transport network;
- planning which ensures net zero emissions from new developments; and
- the creation of carbon fixation via rewilding and protection of natural habitats.

Landscape & Townscape (SA Objective 9)

The SA and Plan sites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring, in terms of, design and site selection.

Housing (SA Objective 13)

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types and sizes of home (a minimum of 35% to be affordable housing), however, affordable needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will be less pressure to build on the greenfield sites.

Included files

Title Question: Sustainability Appraisal

ID EGS2315

Person ID 610662

Full Name Mr Antony Harbidge

Organisation Details Chairman
Berkhamsted Residents Action Group (BRAG)

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment The SA conclusion 7.1 states that the Council have been successful in achieving their SA objectives "*by maximising the levels of development in the existing urban areas the amount of greenfield land needed will be minimised, thereby reducing the scale of these effects.*"

But DBC's Plan does nothing of the sort. The facts simply do not support that conclusion. Look at the numbers – excluding windfall, only 23% of the planned development to 2050 is on Brownfield sites, leaving 77% to be built on Green Belt or Greenfield sites (64% Green Belt). This is not a ratio that in anyway suggests that the DBC have effectively analysed urban capacity correctly or maximised “*the levels of development in the existing urban areas*”.

BRAG notes that CPRE Herts have come to the same conclusion that DBC underestimate potential brownfield regeneration opportunities:

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

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

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

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

In response to section 7 (Housing Strategy), BRAG touched on the potential increase in urban development opportunities with changing work practices post-Covid, but we can also look to the past to see how DBC are failing to plan to maximise “*the levels of development in the existing urban areas*”.

Again, this was covered in BRAG's response to section 7 (Housing Strategy) but it bears repeating here to highlight exactly how absurd conclusion 7.1 of the SA report is.

In section 7, paragraphs 7.6, 7.9 and Table 2 are confusing when comes to windfalls. Both 7.6 and 7.9 state that 200 homes pa have been used but Table 2 only shows 2,408 in total which equates to 133.8dpa.

Paragraph 7.9 states *“Our analysis indicates that windfall sites will play an important part in the housing programme (at 200 homes pa). They are made up of a wide range of small to large sites from a variety of sources that have been calculated using historic delivery rates and expected future trends. We believe it is justified based on past local evidence and is a reliable source of supply across the Plan period.”*

But DBC’s Urban Capacity Study shows windfalls have come on-line at the rate of 306.2dpa (4,287 total) over the last 14 years. In projecting forward for the totals in Table 2, DBC have effectively reduced their windfall expectation by a massive 56% from what has been achieved in the last 14 years.

DBC clearly have a different view of *“expected future trends”* than most other observers, including Government, who expect increased windfall urban development as working practices change post Covid and change of use applications increase.

This is not BRAG being pedantic or over-zealous in pointing out the discrepancy between Table 2 and paragraphs 7.6 and 7.9, these numbers are of critical importance when it comes to offering our precious Green Belt the protection that the NPPF demands.

Even if taking the windfall rate of 200dpa mentioned in paragraphs 7.6 and 7.9, urban capacity over the life of the Plan would increase to 12,146, which equates to a near 100% uplift over the 341dpa requirement suggested by the 2018-based ONS housing need projections for Dacorum.

Figures from the past 14 years and the knowledge of changes in working practices will almost certainly lead to windfall completions in excess of 50% higher than the 200dpa quoted in paragraphs 7.6/7.9 and more than 129% higher windfalls than quoted in Table 2.

The table below illustrates the importance of this point and how it affects the amount of Green Belt release required to meet the ‘non-target’ of 922dpa, and also illustrates just how DBC have not at all produce a plan that even attempts to maximise development in existing urban areas.

And the table does not account for increased change of use windfalls that is accepted by Government as likely to be a trend going forward. Nor does it reflect the now-expanded permitted development rights highlighted by CPRE Herts, but the final column (Last 5yr Ave) suggests the windfall trend for Dacorum is already increasing.

Conclusion 7.1 goes on to say *“In addition, allocating sites in the most sustainable edge of settlement locations will also help to reduce adverse effects, particularly those relating to transport.”*

Again, this is a statement based on aspirations rather than a conclusion derived from facts. At least in terms of the growth areas being promoted around Berkhamsted. Yes, they are edge of town, but situated on steep valley sides (some gradients in excess of those found on the Tour de France) and ridge top locations at some distance from the town centre,

facilities and the railway station. They will certainly not “*help reduce adverse effects, particularly those relating to transport issues*”.

With respect to Berkhamsted, these locations can only do the opposite and add to the adverse effect, particularly those relating to transport issues.

The SA report seems to give a large weighting to the transport connectivity of Berkhamsted. While Berkhamsted is served by a very good rail service, that service was at capacity (pre-pandemic) and BRAG takes issue with bus services being portrayed as good.

The “*high frequency bus service (No.500)*” referred to in C31 only operates 3 buses per hour Monday-Friday, 2 buses per hour on Saturdays and a single hourly service during Sunday shopping hours. There is no evening service or early services on Saturdays, while it also suffers reliability issues due to its length.

Berkhamsted does not have a sustainable transport system in place and promoting growth on valley side and ridge-top Green Belt locations will only reduce those sustainability credentials further.

The SA report Appendix C does identify the chronic issues revolving around water and wastewater, but as BRAG has highlighted elsewhere there is nothing in the plan to address these issues. DBC’s usual answer is that “*developers have a right to connect and development cannot normally be resisted on the grounds of inadequate water supply or sewerage capacity.*”

BRAG would query whether the Borough is correct in this respect. Things may have moved on but BRAG does know that in the 70's there was a moratorium on house building in South Devon until improved sewage disposal facilities were built, and in Herefordshire due to pollution there is a moratorium on all house building in the River Lugg's catchment area.

Overall, the SA report suffers from the usual confirmation bias traits that accompany analysis that requires specific outcomes to be justified.

DBC’s plan is clearly set out on the premise that we have a large housing target to hit, how do we do we achieve that target it?

Good planning plans for the right houses in the right places.

So, the questions should be, what does our Borough need and how best can we provide for that need?

The SA report would look completely different given the latter questions.

Included files

Title Question: Sustainability Appraisal

ID EGS2341

Person ID 1262984

Full Name Deborah O'Sullivan

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION: Sustainability Appraisal comment Increased Flood Risk
Berhamsted is situated in a valley and during heavy rain and storms the drainage infrastructure often cannot cope. I have seen the road outside my house on many occasions turn into a small river, the tarmac has been lifted and even main drains burst. Anything that reduces the ability of the land to drain and hold water at the top of the hills should be rejected. These sites are situated at valley tops and would lead to more water runoff effecting those lower down the hills.
Air Quality
The plan needs to provide a comprehensive analysis to ensure we have a plan which ensures the reduction of air pollution. Sites should discourage car use, encourage walking and any development should have net zero emissions.

Included files

Title Question: Sustainability Appraisal

ID EGS2440

Person ID 1227518

Full Name Mr John LOWRIE

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2467
Person ID	1262981
Full Name	Chris Mabley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Too much of the evidence is out of date eg Scoping report 2017
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2476
Person ID	1263080
Full Name	Russell Emson
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2533
Person ID	1263148
Full Name	Deborah Fletcher
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Where are the credentials for eco friendly and sustainable water, heating systems
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2649
Person ID	1263231
Full Name	Mr Phil Robinson
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, in so far as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites, the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2660
Person ID	1263235
Full Name	Mrs Vanessa Robinson
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard to the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites, the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2671
Person ID	1161597
Full Name	Stuart Mears
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2680
Person ID	1263237
Full Name	Dr Alice Mears
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2689
Person ID	1263240
Full Name	Stuart and Val Burnett
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2699
Person ID	1263241
Full Name	Mr Stephen Hurley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2710
Person ID	1263245
Full Name	Mr Paul Barritt
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2819
Person ID	1263287
Full Name	Jeremy Bonnar
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within

a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS2831

Person ID 1263206

Full Name Andrew Farrow

Organisation Details Great Gaddesden Parish Council

Agent ID 1253616

Agent Full Name Andrew Farrow

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION: Sustainability Appraisal comment **General**

The purpose of the Sustainability Appraisal Report is "to provide an assessment of the environmental, social and economic effects that would be likely to result from the implementation of strategies, policies and sites included in the Dacorum Draft Local Plan." (1.2)

What has been presented is a relative assessment of the sustainability of the available sites. We would argue that availability is not a function of sustainability and that the Sustainability Analysis should take as its benchmark the optimum location of sites based on the proposed criteria. Whilst this may not affect the relative ranking of the available sites, we believe that it would demonstrate the unsustainability of the proposed locations.

We have significant reservations regarding the sustainability analysis. For example, the Interim Sustainability Appraisal Report Non-Technical Summary states under the heading “sustainable locations” that:

“Given the level of growth required by the plan, it is proposed that some development must take place on the edge of existing settlements which would be at a distance from facilities and services.” (4.4.11)

Rather than “some”, surely this should read “most”?

The same section goes on to say that:

“it is unclear what infrastructure would be delivered to mitigate against negative effects in the absence of the Infrastructure Plan.” (4.4.11)

If it is acknowledged that locating developments some distance from existing infrastructure, and with insufficient knowledge of the mitigating infrastructure to justify calling a location “sustainable”, how is it that the “summary of assessment of spatial strategy and growth options” shows that Options, A, B and Ci (the development of the 3 main towns, just Hemel Hempstead, or development spread across the six main settlements respectively) can be described as “very sustainable” (3.3 and table 2)? This is a misrepresentation of the report’s conclusion and should be either “have a negative effect which is not significant” or more likely, “have a significant negative impact”.

Likewise when all three major development sites (east Tring, south Berkhamsted and north Hemel Hempstead) are only described as “likely to have a positive effect which is not significant” (and we would argue that this is already an overly positive assessment, certainly for north Hemel Hempstead), how does this result in Option A being assessed as “very sustainable” for sustainable locations?

Water supply

With regard to water supply, the Interim Sustainability Appraisal Report Non-Technical Summary notes that

“... the underlying chalk aquifer is assessed as being “over-abstracted”. Therefore, providing for a minimum of 16,596 new dwellings in the Local Plan period would increase this pressure and [the] risk of periodic water shortages increases.” (4.4.2)

Whilst the Interim Sustainability Appraisal Report Non-Technical Summary goes on to say that the Plan includes policies to mitigate against adverse effects on water quality and over-abstraction we can only see one (DM33) which appears to deal with this issue.

In addition whilst the Interim Sustainability Appraisal Report identifies water as a potential incompatibility between the Sustainability Assessment objectives and delivering homes for everyone (s 4.6, figure 4.1), all of the site assessments only assess water as having an uncertain impact (5.4.3 and table 5.4). This inconsistency needs to be resolved.

The NPPF (s.170) expects planning policies to conserve and enhance the natural environment; we do not believe as stated that this objective is delivered by the Plan.

Conclusion

We are unable to follow the process by which the Sustainability Appraisal report has been constructed. It appears to be at best inconsistent, at worse designed to support a pre-determined narrative.

Included files

Title Question: Sustainability Appraisal

ID EGS2885

Person ID 1263425

Full Name Andrew Farrow

Organisation Details Nettleden with Potten End Parish Council

Agent ID 1253616

Agent Full Name Andrew Farrow

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION: Sustainability Appraisal comment The purpose of the Sustainability Appraisal Report is “to provide an assessment of the environmental, social and economic effects that would be likely to result from the implementation of strategies, policies and sites included in the Dacorum Draft Local Plan” (1.2).

What has been presented is a relative assessment of the sustainability of the available sites. We would argue that availability is not a function of sustainability and that the Sustainability Analysis should take as its benchmark the optimum location of sites based on the proposed criteria. Whilst this may not affect the relative ranking of the available sites, we believe that it would demonstrate the unsustainability of the proposed locations.

We have significant reservations regarding the sustainability analysis. For example, the Interim Sustainability Appraisal Report Non-Technical Summary states under the heading “sustainable locations” that:

“Given the level of growth required by the plan, it is proposed that some development must take place on the edge of existing settlements which would be at a distance from facilities and services.” (4.4.11)

Rather than “some”, surely this should read “most”?

The same section goes on to say that:

“it is unclear what infrastructure would be delivered to mitigate against negative effects in the absence of the Infrastructure Plan” (4.4.11)

If it is acknowledged that locating developments some distance from existing infrastructure, and with insufficient knowledge of the mitigating infrastructure to justify calling a location “sustainable”, how is it that the “summary of assessment of spatial strategy and growth options” shows that Options, A, B and Ci (the development of the 3 main towns, just Hemel, or development spread across the six main settlements respectively) can be described as “very sustainable” (3.3 and table 2)? This is a misrepresentation of the report’s conclusion and should be either “have a negative effect which is not significant” or more likely, “have a significant negative impact”.

Likewise when all three major development sites (east Tring, south Berkhamsted and north Hemel) are only described as “likely to have a positive effect which is not significant” (and we would argue that this is already an overly positive assessment, certainly for north Hemel), how does this result in Option A being assessed as “very sustainable” for sustainable locations?

Water supply

With regard to water supply, the Interim Sustainability Appraisal Report Non-Technical Summary notes that “... the underlying chalk aquifer is assessed as being “over-abstracted”. Therefore providing for a minimum of 16,596 new dwellings in the Local Plan period would increase this pressure and [the] risk of periodic water shortages increases” (4.4.2).

Whilst the Interim Sustainability Appraisal Report Non-Technical Summary goes on to say that the Plan includes policies to mitigate against adverse effects on water quality and over-abstraction we can only see one (DM33) which appears to deal with this issue.

In addition whilst the Interim Sustainability Appraisal Report identifies water as a potential incompatibility between the Sustainability Assessment objectives and delivering homes for everyone (s 4.6, figure 4.1), all of the site assessments only assess water as having an uncertain impact (5.4.3 and table 5.4). This inconsistency needs to be resolved.

The NPPF (s.170) expects planning policies to conserve and enhance the natural environment; we do not believe as stated that this objective is delivered by the Plan.

Conclusion

We are unable to follow the process by which the Sustainability Appraisal report has been constructed. It appears to be at best inconsistent, at worse designed to support a pre-determined narrative.

Included files

Title	Question: Sustainability Appraisal
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ID	EGS2974
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Person ID	1164709
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Full Name	Dianne Pilkington
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Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS2993
Person ID	1262892

Full Name	Jean Farrer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	The appraisal system does not take account of the cumulative effect on the area of the individual site assessments. It does not properly assess the immense harm to the AONB and the Green Belt from the overprovision of housing.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3009
Person ID	1258924
Full Name	Natalia Maghdoori
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS3067

Person ID 1146084

Full Name Mr Jason Parr

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Increased Flood Risk

Appraisal comment

Again because Berhamsted is situated in a valley during heavy rain and storms the drainage infrastructure often cannot cope. I have seen the road outside my house on many occasions turn into a small river, the tarmac has been lifted and even main drains burst. Anything that reduces the ability of the land to drain and hold water at the top of the hills should be rejected. These sites are situated at valley tops and would lead to more water runoff effecting those lower down the hills.

Air Quality
The plan needs to provide a comprehensive analysis to ensure we have a plan which ensures the reduction of air pollution. Sites should discourage car use, encourage walking and any development should have net zero emissions.

Included files

Title Question: Sustainability Appraisal

ID EGS3098

Person ID 1263499

Full Name Mrs Angela Burgin

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion

into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS3125

Person ID 1263514

Full Name SAM LETHEREN

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would

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Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected

under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS3146

Person ID 1263526

Full Name MR NICK RIPPER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would

clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific

basis, there is recognition that the land defined as “East of Tring” fails to meet the efficient use of land objective and yet this isn’t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS3170

Person ID 1263537

Full Name MRS SARAH RIPPER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn’t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site’s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS3186
Person ID	1263550
Full Name	ANNABEL FRANCIS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn’t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site’s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p>

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “East of Tring” fails to meet the efficient use of land objective and yet this isn’t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS3246

Person ID 1263566

Full Name Frances Read

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Sustainability Appraisal comment

Included files

Title Question: Sustainability Appraisal

ID EGS3256

Person ID 1155396

Full Name Jane Hodgson

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3292
Person ID	1263610

Full Name	BRYN HENRY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3305

Person ID	1263620
Full Name	EMMA SIMMONDS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal

ID	EGS3318
Person ID	1263631
Full Name	GAVIN NICHOL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3333

Person ID	1263643
Full Name	IAN DESTE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal

ID	EGS3413
Person ID	1263763
Full Name	Adam Kindred
Organisation Details	CBRE
Agent ID	1263757
Agent Full Name	Adam Kindred
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal to support the Local Plan tests a number of key alternatives to the spatial strategy, notably:</p> <ul style="list-style-type: none"> • Option A - Focus growth on the 3 main towns (Hemel Hempstead, Berkhamsted, and Tring); • Option B - Focus growth on Hemel Hempstead; • Option C (i & ii) - Spread growth across the six main settlements; <ul style="list-style-type: none"> • Option Ci: Spread across the six main settlements (low growth at villages); • Option Cii: Spread across the six main settlements (high growth at Bovingdon and Kings Langley); • Option D (i & ii) - New settlement alongside growth at the 3 main towns; <ul style="list-style-type: none"> • Option Di: New settlement in the north-west of Borough • Option Dii: New settlement at Bovingdon airfield; and • Option E - Higher growth option. This option would require the delivery of 1,100 dwellings per annum (dpa) as opposed to Options A—D which are based on 922 dpa, this being Dacorum’s emerging objectively assessed housing need (OAN). <p>As a consistent theme across our response, the approach to the Sustainability Appraisal does not appropriately test the impacts of focusing growth on the 3 main towns of Hemel Hempstead, Berkhamsted and Tring where it is acknowledged that recreational pressure on the Ashridge Commons and Woods SSSI is at its highest. This is reflected in all options presented above in the Sustainability Appraisal given an equal scoring in respect of their impacts of biodiversity.</p> <p>Across Option Ci and Cii there is no consideration of a moderate level of growth in Kings Langley (only low levels of growth or high levels). Considered in the context of a moderate level of growth (greater than that included in the Draft Local Plan but proportionate to the character of the area) there would be an opportunity to mitigate issues that would arise through growth being significantly prioritised in Tring and Berkhamsted (notably impact on Ashridge Commons and Woods SSSI). It is appropriate for Tring and Berkhamsted to accommodate additional levels of growth compared to Kings Langley, however, what is presented in the Draft Local Plan is disproportionate and not justified by the evidence or the role that Kings Langley plays in being a highly sustainable location in close proximity to Hemel Hempstead.</p>

In testing reasonable alternatives associated with the Sustainability Appraisal an option Ciii should be considered that considers moderate growth in Kings Langley.

Included files

Title Question: Sustainability Appraisal

ID EGS3415

Person ID 1263746

Full Name beverly tabbron

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment AS a Berkhamsted resident, I am concerned about the proposal to build on greenfield sites. I have enjoyed walking on the Bridle Way Greenbelt during lockdown which is within walking distance of my house and has been very important for my mental and physical well being. Expansion of housing does not seem to include new medical surgery provisions and will only contribute to the already congested traffic on the high street as people will need to drive into the town centre.

Included files

Title Question: Sustainability Appraisal

ID EGS3449

Person ID 1263124

Full Name Andrew Criddle

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No	
QUESTION: Sustainability Appraisal comment	No Comment
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3473
Person ID	1260178
Full Name	Sally Klinkenborg
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I am very concerned about the protection of woodland, as trees are the lungs of our planet Also there is the fact that Tring does not have the infrastructure to support a large increase in housing.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3486
Person ID	1263805
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	<i>The information regarding existing and proposed traffic levels is not yet available. When it is, I believe it will show a highly detrimental effect on Tring High St, the surrounding AONB, the character of the town and cause major car parking shortages for the town centre, shops, amenities and services.</i>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3506
Person ID	1263807
Full Name	Julia Robinson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	See attached word document with detailed comments on p333-335 Appendix F regarding the Long Marston site assessment and the reasons why the assessment is not a robust or complete assessment. In particular, the assessment fails to take into account the effects on the rural farming economy of Long Marston and the knock on effects to surrounding rural villages, many located in Bucks.
Included files	JR comments p333 to 335 Appendix F of the Dacorum Local Plan Interim Sustainability Appraisal report..docx
Title	Question: Sustainability Appraisal
ID	EGS3514
Person ID	1263817
Full Name	claire bacarisse
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION: Sustainability Appraisal comment	rainwater
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3522
Person ID	1263824
Full Name	Nichola Criddle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<i>The information regarding existing and proposed traffic levels is not yet available. When it is, I believe it will show a highly detrimental effect on Tring High St, the surrounding AONB, the character of the town and cause major car parking shortages for the town centre, shops, amenities and services.</i>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3564
Person ID	1263821
Full Name	Anne Isherwood
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p>I am worried about water supply to meet the number of new house - especailly pressure on the chalk aquifers and the condition of the rivers Gade and Bulbourne should extraction need to be increased.</p> <p>I am also concened about the increased pressure on the exisiting open spaces and countryside from visitors and traffic - the detrimental effects of which are already becoming apparent during the 'lockdowns' and restirctions of the Covid 19 pandemic.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3617
Person ID	1263865
Full Name	Robin McMorran
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3621
Person ID	369415
Full Name	Mr Dacorum EnvironmentalForum
Organisation Details	Chair Dacorum Environmental Forum Waste Group
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>The departure of the Plan from previous policies and judgements when it comes to the assessments of individual Sites is stark and unexplained. A large and flagrant example of this is North Hemel, where in the Sustainability Appraisal Report Appendix E.1 the Plan's assessment tick-list under "Landscape/Townscape", while admitting that . . .</p> <p><i>" The northern boundary of the site is adjacent to the Chilterns AONB and development could affect the setting of the AONB. The site is within the High Gade Valley and Gaddesdon (sic) Row character areas. Development of the site would extend Hemel Hempstead into this prominent area of countryside and close the gap with Piccotts End"</i></p> <p>. . . gives it an amber cross meaning <i>"The option is likely to have a negative effect which is not significant"</i>.</p> <p>Elsewhere we have :<i>"All major development will be required to deliver an overall net gain in biodiversity of 10%, determined by applying the Natural England Biodiversity Metric 2.0 Calculator"</i>.</p> <p>Achievement of this laudable aspiration would require as a baseline a comprehensive biodiversity register in order to quantify the value of all our existing natural habitats before one could begin to assess how they would be affected by development.</p> <p>The Draft Plan does little if anything, by way of policies, to deal with the current poor state of our rivers and the current problems related to water use, let alone deal with the even greater crisis which would exist as more development takes place.</p> <p>Moving on to the <u>"Interim Sustainability Appraisal Report"</u>, there is much here which one assumes provides the evidence on which the policies in the main document are based/devised. The Water section starts on page 45.</p> <ul style="list-style-type: none"> •provides the key policy context including the current Key Directives, Regulations and Plans in relation to water and water One of the key aims is <i>"to prevent deterioration and where possible improve the quality of rivers and other water bodies"....to "good ecological and chemical status"....and for "groundwater to reach good status" by 2027 at the latest.</i> •outlines in detail the concerns about water quality and in more detail, the quantity of water for consumption. It refers to the underlying chalk aquifer as being <u>"over-abstracted"</u> and the groundwater resources being <u>"at or approaching full utilisation"</u>. It also estimates that <u>climate change</u> will result in a further 5% loss of available water by

Despite these statements, DEF can see no clear policies in the main Plan Document which address these points either in the detail or the urgency which is clearly needed.

Further into the Sustainability Report, Water is considered in relation to the assessments of each of the main development options A to E. (C.17 to C.18). The section on the generic effects for all of the options states, “*Any new housing development will put pressure on water resources. The higher the level of housing the greater the potential adverse effects will be*”. It also refers to the increasing potential for water pollution and sewer floods. At the highest level of development periodic water shortages are likely. The evaluation of the development options appears to be unable to give a value to the negative impacts (i.e. Unknown). The section on mitigation of the negative impacts, offers some ideas on actions to be taken , but these are not evaluated, and says merely that they will “*help to mitigate the potential adverse effects on water quality and the availability of water resources that may arise from new development*”. This statement clearly recognises that not all detrimental effects will be avoided and one can only assume that the present poor state of our rivers will get worse.

By way of summary, the Draft Plan does little if anything, by way of policies, to deal with the current poor state of our rivers and the current problems related to water use, let alone deal with the even greater crisis which would exist as more development takes place.

For our full response see:

The attached document if you are receiving this by E-mail

The link below if you are viewing this online

<http://dacenvforum.org.uk/> and look under "Consultations etc."

Included files

Title Question: Sustainability Appraisal

ID EGS3637

Person ID 1263885

Full Name Mr Neil Roberts

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3644
Person ID	1145631
Full Name	Mr Alastair Greene
Organisation Details	Clerk Little Gaddesden Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3678
Person ID	488516
Full Name	mr hugh siegle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p>I disagree with some of the conclusions in the TRL report (25.2) as I did with their 2017 report but it is impossible to respond fully to a detailed 65 page report, on computer and with guidance on interpreting various tables lacking. For instance table 5.5 on Berkhamsted sites. What does it mean?</p> <p>Fig 4-1 looks at compatibility. How can it be concluded that there is no significant relationship between "conserving and protecting the natural environment" and either the "sustainable locations" or "housing" objectives .</p> <p>The report concludes that in choosing option ci they recognise there will be " minor negative effects" and at 922dpa there will not be unnecessary burdens on infrastructure such as schools, health, transport, water treatment ,etc..How can anyone reach these conclusions?</p> <p>6.4.3 SA2 Water. Pressure on the supply of potable water is recognised but the policies, specifically DM33 offer no solutions and seem more concerned with pollution.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3763
Person ID	1263921

Full Name	sarah diehl
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3778
Person ID	1263939
Full Name	Mr Richard Dawkins
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Based on the response to question 5, the assessment for Bank Mill Lane on p38 of the Interim Sustainability Appraisal Report of November 2020 should be amended as follows:</p> <ul style="list-style-type: none"> • Flood risk is red • Air quality is amber • Health and Well being is half amber half green • Sustainable location is amber • Employment and skills is half yellow and half green

Included files	
Title	Question: Sustainability Appraisal
ID	EGS3785
Person ID	1144948
Full Name	Mr Peter Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3799
Person ID	1263887
Full Name	Atherton Powell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	

Title	Question: Sustainability Appraisal
ID	EGS3823
Person ID	1263962
Full Name	Susie Alderson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	The Sustainability Appraisal Report non-technical summary has a number of links not working the wording says "Error! Reference source not found" so I have been unable to look at the information that these links were supposed to go to. So all information is not available to view.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3901
Person ID	1263998
Full Name	Mrs Lara Dixon
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Flooding No detailed assessment has been made of the increased chance of flooding in the Berkhamsted Valley with continued development. Removal of green spaces and agricultural land will decrease the infiltration rate and increase surface run

off of rain water. This can already been seen in the town during heavy rain. New Road becomes a river during downpours and the water heavy in sediment and pollution from the road surface, runs downhill towards the canal and the Bulbourne stream. The drains do not cope very well, even now.

Included files

Title Question: Sustainability Appraisal

ID EGS3954

Person ID 1264025

Full Name Caroline Sherwen

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Sustainability Appraisal comment

Included files

Title Question: Sustainability Appraisal

ID EGS3978

Person ID 1263016

Full Name Joanna Brown

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment	<p>Water supply in this area is constrained being supplied by the local aquifer which also feeds our Chalk Streams. The Environment Agency says that abstraction is to be restricted to 'current' levels. This poses a challenge to the Infrastructure Plan and is a critical aspect of the proposal to increase dwelling numbers by over 20% in this locality. New supplies of water for this area are not likely to be possible until after 2030.</p> <p>The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This could take 10 years plus.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS3997
Person ID	1261840
Full Name	Rachel Heath
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS4005
Person ID	1263249
Full Name	Claire Whitely
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>The way the assessment of environmental impacts has been done does not appear to account for cumulative effects of building on multiple sites in the same area. Specifically in Tring where the proposed allocation is over multiple sites on green belt which would have a cumulative effect on the wider area and isn't accounted for in the assessment.</p> <p>While there is recognition that the land defined as East of Tring (Tr02 and Tr03) fails to meet the efficient use of land objective and yet this isn't taken through to the results. This land is green belt and is highly sensitive due to its contribution to green belt openness, its interrelationship with the AONB and its agricultural/ecological contribution to the wider area. Use of this area will cause substantial damage that cannot be reversed or mitigated and which the plans do not justify. the sustainability appraisal clearly identifies this harm but it has not been acknowledged in the final approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS4181
Person ID	1145844
Full Name	Dr and Mrs Melvyn Else
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS4211
Person ID	1263248
Full Name	Johnjo McDermott

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I am opposed to the development of proposed site Tr01</p> <p>Whilst supporting the efforts of Dacorum to play its part in solving the national housing shortage, particularly for local young people who cannot afford houses, we strongly oppose the Dacorum local plan 2020 to 2038 as currently proposed.</p> <p>The number of new homes needed:</p> <p>... is based on outdated figures: the plan is based on Office of National Statistics data from 2014, the more recent predictions of 2018 more than halve the number of new homes needed in Dacorum, and even that data is from before Brexit and Covid so out of date.</p> <p>... the housing target for Hertfordshire is higher than the comparable counties of Surrey and Sussex (www.lichfield.uk).</p> <p>... there must be a binding commitment for affordable homes in the plan. Too often developers have been allowed to wriggle out of this commitment. Tring is not suitable for this kind of increase in population:</p> <p>... there is no capacity for more footfall at the station, the car park gets full and the trains to London overcrowded (based on pre-covid numbers).</p> <p>... the High Street is unsuitable, as the main throughfare from east to west Tring the High Street is narrow and overcrowded for both traffic and pedestrians at peak times. The structure of the High Street has subsided with the current levels of traffic, this will only get worse.</p> <p>... under the current proposals Tring bears the brunt of new housing with more homes than other towns in Dacorum (percentage terms).</p> <p>... there are currently electric vehicle charge points in Forge car park and at Tesco, this is clearly insufficient for a town the size of Tring. Environment</p> <p>... the plan should allocate land for new allotments for the residents so they can grow their own fruit and vegetables.</p> <p>... the plan must commit to increase habitat for wildlife, including wildlife corridors and re-wilded areas to increase bio-diversity.</p> <p>... there should be recreational corridors built into the plan to promote cycling and walking in a safe environment, they should be wide with natural vegetation and not narrow alleyways.</p> <p>Sustainability</p>

... Building Standards, the plan uses the right words to describe sustainability standards, but offers no commitment to these. All new buildings should be designed to meet the most stringent standards and must be at least net zero carbon. Every home should include a parking space with electric charging, should not be reliant on fossil fuels for heating and should include solar PVs. There is no commitment to this in the Local Plan.

... Public Transport, the plan makes no promise to improve public transport to connect these homes, so people do not have to rely on cars on a road structure that in many cases cannot be widened.

Summary

... Dacorum has declared a climate emergency, this plan should give the opportunity to put that into practice and create an inspirational environment where we can live and work together with nature. Instead the Local Plan is unimaginative and will become a developers dream of suburban sprawl, not something we will be proud of. If there is one thing that has become apparent in recent years, it is that we can't carry on as before and that we need to find a better way forward.

Included files

Title Question: Sustainability Appraisal

ID EGS4225

Person ID 1264301

Full Name James Stringer

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “East of Tring” fails to meet the efficient use of land objective and yet this isn’t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS4246

Person ID 1264320

Full Name JACKIE GLOSSOP

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn’ t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site’ s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “ East of Tring” fails to meet the efficient use of land objective and yet this isn’ t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS4275

Person ID 1264269

Full Name Paul de Hoest

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment Numerous local groups have commented on this consultation including Berkhamsted Residents Action Group (BRAG), Berkhamsted Citizens Association, CPRE, Chiltern Society, Berkhamsted Town Council, Dacorum Green Party, Berkhamsted and Tring Labour Party to name a few. **I agree with the stance taken by all of these groups.** The fact that all these (and there will be others) are providing the same substantive message from the local population to you should demonstrate that these proposals do not have the support of the people. I do not propose to add to your reading burden by rehashing all of their points

Included files

Title Question: Sustainability Appraisal

ID EGS4367

Person ID	1262873
Full Name	Donna Atkinson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants" Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS4473
Person ID	1264316
Full Name	Melanie Turner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	There is no mention of the Bulbourne Cross development in this proposed plan – tthis needs to be taken into account.

The Strategy fails to take into account the combined impacts of the coronavirus pandemic. Greater emphasis should be given to regeneration of previously developed land in order to reduce the amount of housing and employment development on Green Belt and other greenfield sites outside of existing towns and villages.

Berkhamsted has a congestion problem and does not have a sustainable transport system as DBC suggests. Building on steep valley sides and along ridge tops at a distance from facilities will exacerbate problems.

Included files

Title Question: Sustainability Appraisal

ID EGS4504

Person ID 1264395

Full Name R Jane Dickson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment Water: proposed new housing would put direct pressure on Dacorum's water resources, which are already identified as 'over-abstracted'. Until significant new infrastructure could be provided, the only option e.g. in periods of drought would be to extract more water from the chalk aquifer, thus further damaging our precious chalk streams e.g. the Rivers Gade and Bulbourne.

Traffic: There are potential issues with the increased traffic volumes on the B440 and in surrounding villages, where the roads are unsuitable for such increases – as explained in an earlier response.

Included files

Title Question: Sustainability Appraisal

ID EGS4549

Person ID 1261836

Full Name Richard Sutton

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>My family and I moved to Dacorum in 2018 to settle in Berkhamsted for at least the next 25 years. Over this time, we look forward to developing ever stronger links throughout the community and watching our young children grow to adulthood. As such, we have a vested interest in seeing the Borough grow in a way that works for all its citizens – both existing and new.</p> <p>Against this backdrop, I wish to formally state my strong objections to the ‘Dacorum Local Plan (2020-2038) Emerging Strategy for Growth’. The evidence suggests that, if this plan is approved, your personal legacy will be of considerably worsening towns and communities within the Borough. For new residents moving to the area and for those already here. For all ages. And for all financial situations. I suspect you don’t want to be remembered after you leave this office as the person who caused such damage to an area. So, I ask you to fundamentally rethink.</p> <p>Due to the COVID-19 constraints on travel and mingling for the past year, my experience, and hence prime objection, focuses on the portions of the Local Plan relating to developments in the Berkhamsted area.</p> <p>To summarise:</p> <ol style="list-style-type: none"> 1. Flawed modelling of number and type of housing required would fail to meet the actual needs of the voters moving into the area, whilst disrupting those already here far more than is needed. 2. Inadequate commitment to transport infrastructure needs to accommodate the changes proposed would result in a legacy of decades of traffic congestion for voters in Dacorum and visitors to the area. 3. Insufficient provision of water supply, wastewater disposal and other infrastructure would leave households with shortages and damage the local water table, with knock-on considerations around subsidence and environmental impact. 4. Unworkable assumptions around public transport and foot / bike journeys would see considerable increase to carbon emissions in the Borough and considerable travel delays around vital transport hotspots (town centres, schools, rail stations, etc.). 5. The above worsening of conditions for the new and existing voters in the area also comes with an ecological cost due to the loss of green belt. If green belt is to be repurposed, it must be done in a way that makes the greatest positive impact for the current and future residents of Berkhamsted. This plan wastes that sacrifice. <p>These are fundamental flaws in the strategy underpinning the ‘Dacorum Local Plan (2020-2038) Emerging Strategy for Growth’. As such, this plan should be rejected outright, and a new plan drawn up that addresses the actual needs of the area for today and the long-term success of the Borough.</p> <p>These points are expanded below.</p>

Incorrect Assumptions for Housing Provision

Whilst accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, the scale of proposed development in Dacorum is out of balance with the long-term needs.

The Local Plan does not take account of National Planning Policy Framework (NPPF), paragraph 11, footnote 6, which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and Area of Outstanding Natural Beauty (AONB).

Recent Government guidance on calculating housing need has been, at best, confusing. The algorithm for calculating housing need that has been used by the Council is a flawed means to calculate the housing needs of the Borough, based on old data.

The correct calculation of the housing needs in Dacorum should be based on the most recent and relevant data, which is currently the 2018 based Office for National Statistics (ONS) projections. Instead, the Local Plan is based on calculations using outdated 2014 based ONS data, which results in a significant overestimate of housing needs.

I note that on 16 December 2020 the UK Government published its response to the local housing need proposals on the consultation on changes to the current planning system. This sets out important changes to the standard method which has been amended so that the 20 most populated cities and urban centres in England (none of which are in Dacorum) see their need uplifted by 35%. The Government also said:

"More broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We (Government) should be clear that meeting housing need is never a reason to cause unacceptable harm to such places. ...

Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt."

Failure to Provide Adequate Supportive Infrastructure

Looking at the proposed developments on Green Belt land, there is insufficient consideration in the Local Plan for the provision of new infrastructure or upgrading the current infrastructure to support the scale of the proposed developments.

Taking a specific example of transportation, consider area 'Bk01 - South of Berkhamsted'. This proposes adding 850 residential units with 2 ways out of the development:

1. Emerging immediately next to a secondary school of over 1300 pupils; and
2. Passing two primary schools on a single, narrow residential road with a 10% gradient and car parking on both sides.

These roads are heavily congested during normal times with the current population – the road by the secondary school backing up during school run times to the main A41 route into and out of the town. Adding 850 households of cars will lead to transport paralysis for the new residents, the homes already in the area, pupils of the schools and people trying to access Berkhamsted from the A41 during peak times.

Similarly, increasing the number of dwelling by over 1,800 in the Berkhamsted area will result in a considerable increase in vehicular traffic through the centre of the town – a route that is already heavily congested at peak times at the A4251 / A416 junction and along the High Street. This is due to the historic layout of the town along a valley with steep sides meaning there are only these two roads into and through the town.

For the increase in population proposed in the Local Plan, there would need to be a considerable extra investment in road widening, traffic flow control measures and new roads to bypass the congestion points inherent with a medieval market town situated in a steep river valley.

Impact on Green Belt and Other Designated Land

The Local Plan states that a key objective is “minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB”. This strategic principle is then violated by the declared mission to provide at least 100% of the Council’s self-assessed housing need, regardless of the impact on the environment, infrastructure, climate change and biodiversity.

Noting that 85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns AONB, this approach comes at considerable environmental cost.

As such, the Local Plan must be fundamentally reworked to avoid such contradictions in strategic goals and principles.

You are now faced with a personal choice.

Whether to be remembered for taking the easy choice and sticking to an inherently flawed plan that will deeply damage the Borough of Dacorum forever – your lasting legacy – or to take the brave decision and do what is right – to reject the current plan and come back with one based on the actual needs of the current and future voters and households of Dacorum.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS4589
Person ID	1145918
Full Name	Mr Richard Tregoning
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
QUESTION: Sustainability Appraisal comment	This section is basing impact on the unsustainable and wrong growth statistics of both industry, population. No comment can be made before DBC withdraws the current plan from the are of improbable growth and allows its citizens to comment on growth statistics in the real world. Issuing any cooment based on plan figures which are unreal is not pssible
Included files	
Title	Question: Sustainability Appraisal
ID	EGS4654
Person ID	1264487
Full Name	Mrs Sue Edmanson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	Q6 Flooding is an issue in Tring East and given the area, assessment of impact on wildlife, habitat loss, water consumption and waste should be further priorities.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS4692
Person ID	1145431
Full Name	mr David van Rhee
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS4734
Person ID	1263004
Full Name	Jill Townsend
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS4835
Person ID	1257705
Full Name	Mark Barfield
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion</p>

into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS4843
Person ID	1264531
Full Name	PAUL KENT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion</p>

into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS4849

Person ID 1264475

Full Name Simon Davies

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Sustainability Appraisal comment

Included files

Title Question: Sustainability Appraisal

ID EGS4873

Person ID 1264533

Full Name MAURICE OKEEFFE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS4893
Person ID	1150594
Full Name	Catherine and Mark Richardson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p>We have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS4911
Person ID	1264537
Full Name	KATHERINE COURTNEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS4915
Person ID	1264536
Full Name	Mr George Harvey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS4929
Person ID	1264540
Full Name	JOSEPH DAWSON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within

a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS4937
Person ID	1260771
Full Name	JAMIE BELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS4953
Person ID	1264546
Full Name	Dr Calvin Veeroo
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken</p>

down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS4980
Person ID	1264548
Full Name	Mrs Sasha Godfrey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape

independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS4996
Person ID	1264549
Full Name	Mrs Kate Carter
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn’ t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site’ s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS5080

Person ID 1264258

Full Name Fintan FitzPatrick

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment As stated in the Sustainability Appraisal: *“any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects ... relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants”*

Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure

There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.

Biodiversity (SA Objective 1)

Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land.

Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.

Flood Risk (SA Objective 3)

SA states it has found 'no predicted effects' against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road, floods regularly.

Greenhouse gas emissions (SA Objective 4)

The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

Air Quality (SA Objective 5)

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites which do not encourage car use or increase congestion;
- the creation of a robust electric transport network;
- planning which ensures net zero emissions from new developments; and
- the creation of carbon fixation via rewilding and protection of natural habitats.

Landscape & Townscape (SA Objective 9)

The SA and Plan sites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring, in terms of, design and site selection.

Housing (SA Objective 13)

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing

tenures, types and sizes of home (a minimum of 35% to be affordable housing), however, affordable needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will be less pressure to build on the greenfield sites.

Included files

Title Question: Sustainability Appraisal

ID EGS5142

Person ID 1264550

Full Name Kevin Fielding

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

I am concerned at the lack of detailed environmental surveys of the Green Field Sites proposed in the various options as this means this report is based upon insufficient data. However, the report makes the unsustainability of the Dacorum plan clear, regardless of the sites / options chosen.

There are numerous statements in this study that clearly show all the Dacorum Plan options are at odds with national strategy on sustainability. This is simply because they include growth on Green Belt Land. We should clearly scale back growth to Brownfield Sites only in this area (to provide for local families and offspring), encouraging development in other areas of the country where more brown field sites are available to provide for other housing requirements (such as London outflow).

Here is one quote as illustration:

"Under all the options any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects including amongst others those relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants."

We simply should not be contemplating this.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS5147
Person ID	1264462
Full Name	Penny Clifton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>This plan is not sustainable.</p> <p>Only 23% of the planned development to 2050 is on brownfield sites, meaning that 77% (more in Berkhamsted) will be built on green belt or greenfield sites (64% green belt). This does not suggest that Dacorum BC have analysed urban capacity correctly or made best use of brownfield regeneration opportunities.</p> <p>In addition, recent social changes including working from home during the pandemic, means that there will be more opportunities to convert commercial space (especially office and retail) to residential use than is recognised here. This means that many of the proposals for development on green belt and greenfield sites are likely to be unnecessary. It is widely acknowledged that the changes in working due to Covid, will mean plenty of retail/commercial sites become available that will affect this plan. These major changes have not been taken into consideration.</p> <p>Berkhamsted does not have a sustainable transport system - primarily poor bus provision; poor road capacity and unsuitability for cycling - and promoting growth on valley side and hill top locations in the green belt will only reduce those sustainability credentials further.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS5243
Person ID	1264608
Full Name	Nicola Beadle

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS5279
Person ID	1175740
Full Name	Berkhamsted Schools Group
Organisation Details	The Berkhamsted Schools Group
Agent ID	1175743
Agent Full Name	Kevin Rolfe
Agent Organisation	Group Director, Development & Planning Aitchison Raffety
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	We agree with the robust process and criteria followed and note that the report supports the fact that for site BK03 no significant effects were identified. We note that the SA has found that overall, the Draft Local Plan performs well in relation to the SA objectives and agrees that by allocating sites in the most sustainable edge of settlement locations will also help to reduce any adverse effects.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS5296

Person ID	1262731
Full Name	Julie Battersby
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	There has been insufficient time for me to consider the detail of these supporting documents, but I have made comments that relate to them in other sections that I trust will be taken into account. I request the consultation is revised and resubmitted with a longer deadline.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS5312
Person ID	1264532
Full Name	Robert Clarke
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS5342

Person ID	1264616
Full Name	Philip Daw
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>The Strategy fails to take into account the combined impacts of the coronavirus pandemic. Greater emphasis should be given to regeneration of previously developed land in order to reduce the amount of housing and employment development on Green Belt and other greenfield sites outside of existing towns and villages.</p> <p>Berkhamsted has a congestion problem and does not have a sustainable transport system as DBC suggests. Building on steep valley sides and along ridge tops at a distance from facilities will exacerbate problems.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS5379
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I fail to see how these developments could be environmentally sustainable.
Included files	

Title	Question: Sustainability Appraisal
ID	EGS5390
Person ID	1262255
Full Name	AJ W
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	The initial numbers required for a faux target are flawed and the requirement for the housing to meet this target does not need to come from green belt land, the calculation for windfall wildly underestimates these numbers and post pandemic these numbers should be revisited.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS5414
Person ID	1258646
Full Name	Jane Timmis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	

Title	Question: Sustainability Appraisal
ID	EGS5520
Person ID	1264647
Full Name	Richard Burnell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	

Title	Question: Sustainability Appraisal
ID	EGS5528
Person ID	1264617
Full Name	Victoria Latham
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Table 4-1 of the Sustainability Report lists a number of climatic factors that will be exacerbated by these developments and there does not appear to be any way to sufficiently mitigate for these given the number of homes that are proposed, chiefly:</p> <p>Water Table - Dacorum is fed by a chalk aquifer, with no other local water supply, and is already under pressure from the local demand. The table states climate change and population growth will affect water resources (supply and demand),</p>

increase the risk of flooding and drought conditions. There is no clear plan as to how the increased demand will be met without damage to the borough's three chalk rivers which are classified as priority habitats under section 41 of the Natural Environment and Rural Communities Act 2006. Unless Affinity Water plans to build a waterpipe out-of-area (and there is no obvious source), there is a high probability that the water situation is unresolvable, which may not become fully apparent until years after the builds are complete, as they reach full capacity.

Net zero by 2050 - the National Planning Policy Framework and the 2004 Planning and Compulsory Purchase Act requires a plan for local carbon reductions and an evidence-base for this is required to meet the national climate obligations of net zero by 2050. This plan does not do that and fails to properly invest in the transport in the smaller market towns of Berkhamsted and Tring, that will be required to dissuade residents in the outer developments from driving into town.

Chilterns AONB - The 2019 Glover Report recommended that the Chilterns AONB, including areas covered by this plan, should become England's next National Park and yet there is no mention of the report, or its implications, in the local plan or strategy. It is essential that this is taken into consideration and we do not damage the AONB in the process of ensuring we have sufficient suitable housing, infrastructure and communities for our population. That is why it is imperative that the numbers of homes needed is reviewed in light of current projections and that the location of those homes is reviewed in the aftermath of the pandemic, to repurpose abandoned existing office and potentially retail space.

Included files

Title Question: Sustainability Appraisal

ID EGS5567

Person ID 1264048

Full Name Alison Fraser

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Sustainability Appraisal comment

Included files

Title Question: Sustainability Appraisal

ID	EGS5577
Person ID	1264491
Full Name	Paul Wade
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS5578
Person ID	1264651
Full Name	Tom Beecroft
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	The proposed developments in Northchurch (West of Berkhamsted) contain insufficient social housing to meet local needs. For example, a semi-detached house in the Bearroc 2 site, adjacent to the new Northchurch developments, is priced between £500,000 and £800,000. This must be way beyond the means of people in Dacorum who need housing.
Included files	
Title	Question: Sustainability Appraisal

ID	EGS5616
Person ID	1264688
Full Name	Nick Head
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Cars are a source of air pollution and so inevitably 16,596 new homes will increase emissions. This plan should include research into the impact of this on air quality, remembering that a large proportion of the town's school-children walk to school. We should also be monitoring the impact on air quality on an ongoing basis.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS5713
Person ID	1262957
Full Name	Gregory Hukins
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal

ID	EGS5798
Person ID	1144878
Full Name	Mr Peter Moore
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Consequent upon the pandemic, the reports of 2020 should be revised to take account of future economic, societal and environmental impacts arising from behaviours and needs prompted by the pandemic and Dacorum's response to it.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS5819
Person ID	1263271
Full Name	caroline killin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>With reference to section F7 of Appendix F (pages 333 to 335 inclusive), I am writing to object in the most strongest terms to any proposal for mass development in the vicinity of Long Marston.</p> <p>The proposed site includes agricultural land, sites of archaeological importance, wildlife habitats and private properties, all of which would be decimated should such a proposal be implemented. We only have one planet and need to protect and cherish it as custodians for our children and their children. If growth continues at the current rate at some point in the future there will be no green spaces left. Is that the future you wish your grandchildren to inherit?</p>

The area includes multiple public footpaths and in the current pandemic has proved well used and critical for enabling people to get out and exercise and for their mental well being. If the proposal went ahead this opportunity would be denied for future generations.

The area is prone to flooding with many properties flooded over recent months and years. The impact of this on peoples' lives, both financially and mentally, has been huge. Families have had to vacate their homes and are still not able to move back in several months later.

There is a high pressure mains gas pipeline that runs through the proposed site taking gas to Marsworth, Tring and beyond. It would not be possible to build on or near this pipeline.

The loss of agricultural land would impact on our country's ability to feed it's own at a time when there is an ever increasing need for self sufficiency due to Brexit etc.

There are several sites of archaeological and historical interest e.g. Tiscott, Betlow, Ardwick included and/or very close to the proposed development site. It is important for our heritage that we preserve these sites.

I have lived in the area proposed for development for over 30 years and in that time have seen a huge increase in traffic and a big increase in the size and number of lorries using the lanes. The roads can not cope with the existing traffic levels with regular congestion outside the village school, at times a danger to life with lorries mounting the kerb to manage the turn at the crossroads at the heart of the village. Living where we do necessitates using a private car to access doctors, food shopping and all other amenities. As such any development of any size would result in at least 1, in all likelihood 2, additional cars extra on the road for each additional house built. This could potentially be an additional 3,800 to 7,600 additional cars on an already overloaded road network.

I fully appreciate that there is a need for more housing however this can and should be met by utilising brown field sites and smaller less imposing and more strategically placed new builds placed alongside existing major roads and infrastructure.

Included files	Flooding photos.docx
Title	Question: Sustainability Appraisal
ID	EGS5878
Person ID	1264761
Full Name	Sarah Durant
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	The plan represents a land grab on green belt land - land that is critical for the well-being and welfare of Dacorum residents. It is a massive overdevelopment that will degrade the environment and ecology of an outstanding area of national beauty. It has a particularly damaging impact on Tring, where I live, with a planned increase in size of 55%. This will destroy the character of the town forever. Tring does not have the infrastructure to support such a enormous increase in size, the concomittant increase in cars and lorries will increase air pollution - air that is trapped already by the surrounding hills. The plan must be rejected outright.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS5929
Person ID	1261255
Full Name	Sarah Lightfoot
Organisation Details	
Agent ID	1261248
Agent Full Name	Sarah LIGHTFOOT
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I support and endorse the comments made by CPRE and BRAG.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS5937
Person ID	1264752
Full Name	Chris Brown
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>The SA conclusion 7.1 states that the Council have been successful in achieving their SA objectives “by maximising the levels of development in the existing urban areas the amount of greenfield land needed will be minimised, thereby reducing the scale of these effects.”</p> <p>But DBC’s Plan does nothing of the sort. The facts simply do not support that conclusion. Look at the numbers – excluding windfall, only 23% of the planned development to 2050 is on Brownfield sites, leaving 77% to be built on Green Belt or Greenfield sites (64% Green Belt). This is not a ratio that in anyway suggests that the DBC have effectively analysed urban capacity correctly or maximised “the levels of development in the existing urban areas”.</p> <p>CPRE Herts have come to the same conclusion that DBC underestimate potential brownfield regeneration opportunities: “The proposed local plan fails to take into account the impacts of the coronavirus pandemic and recently expanded permitted development rights, both of which are likely to result in much greater conversion of commercial space (especially office and retail) to residential use. The potential for such windfall provision of housing throughout the borough is likely to be much higher than that identified in the proposed plan. As a result, such a windfall many of the proposals for development on Green Belt and greenfield sites outside of existing towns and villages are likely to be unnecessary.</p> <p>Dacorum Borough Council should consider promoting mixed use living spaces in town centres. This has the potential to provide much needed affordable housing and provide a sustainable transport solution for local communities. The plan lacks a vision for the long- term future of retail and leisure parks that create better people friendly places and that are not designed around cars. A good example of mixed-use living spaces in town centres is the recent re-development of a retail park in Watford.</p> <p>In the light of recent events (Covid and Brexit) and trends in the retail sector, the government has announced a new approach to promotion of redevelopment and changes to the way our urban land is used, in particular the reconsideration of how much, and which existing retail, industrial and commercial land and premises can be more efficiently and sustainably used in a different way. The now-expanded permitted development rights allow commercial space to be converted to residential (as well as adding additional storeys on top) without need for planning permission.</p> <p>This new opportunity appears to have been ignored in the preparation of the proposed plan.”</p> <p>I have already mentioned the lack of consideration. to post Covid world, touching on the potential increase in urban development opportunities with changing work practices post-Covid.</p>

In section 7, paragraphs 7.6, 7.9 and Table 2 are confusing when comes to windfalls. Both 7.6 and 7.9 state that 200 homes pa have been used but Table 2 only shows 2,408 in total which equates to 133.8dpa.

Paragraph 7.9 states “Our analysis indicates that windfall sites will play an important part in the housing programme (at 200 homes pa). They are made up of a wide range of small to large sites from a variety of sources that have been calculated using historic delivery rates and expected future trends. We believe it is justified based on past local evidence and is a reliable source of supply across the Plan period.”

But DBC’s Urban Capacity Study shows windfalls have come on-line at the rate of 306.2dpa (4,287 total) over the last 14 years. In projecting forward for the totals in Table 2, DBC have effectively reduced their windfall expectation by a massive 56% from what has been achieved in the last 14 years.

From my research, DBC seem to have a different view of “expected future trends” than most other observers, including Government, who expect increased windfall urban development as working practices change post Covid and change of use applications increase.

These numbers are of critical importance when it comes to offering our precious Green Belt the protection that the NPPF demands.

Even if taking the windfall rate of 200dpa mentioned in paragraphs 7.6 and 7.9, urban capacity over the life of the Plan would increase to 12,146, which equates to a near 100% uplift over the 341dpa requirement suggested by the 2018-based ONS housing need projections for Dacorum.

Figures from the past 14 years and the knowledge of changes in working practices will almost certainly lead to windfall completions in excess of 50% higher than the 200dpa quoted in paragraphs 7.6/7.9 and more than 129% higher windfalls than quoted in Table 2.

The table below, sourced from Berkhamsted residents Action Group, illustrates the importance of this point and how it affects the amount of Green Belt release required to meet the ‘non-target’ of 922dpa, and also illustrates just how DBC have not at all produce a plan that even attempts to maximise development in existing urban areas.

And the table does not account for increased change of use windfalls that is accepted by Government as likely to be a trend going forward. Nor does it reflect the now-expanded permitted development rights highlighted by CPRE Herts, but the final column (Last 5yr Ave) suggests the windfall trend for Dacorum is already increasing.

Based on data from:

Table 2

Para 7.6/7.9

Last 14yr ave

Last 5yr Ave

Windfall rate (dpa)

133.8

200

306.2

346.3

Total Windfalls Across Plan

2408

3600

5512

6233

Dwellings Required In Green Belt

5642

4450

2538

1817

Conclusion 7.1 goes on to say “In addition, allocating sites in the most sustainable edge of settlement locations will also help to reduce adverse effects, particularly those relating to transport.”

Again, this is a statement based on aspirations rather than a conclusion derived from facts. At least in terms of the growth areas being promoted around Berkhamsted. Yes, they are edge of town, but situated on steep valley sides (some gradients in excess of those found on the Tour de France) and ridge top locations at some distance from the town centre, facilities and the railway station. They will certainly not “help reduce adverse effects, particularly those relating to transport issues”.

With respect to Berkhamsted, these locations can only do the opposite and add to the adverse effect, particularly those relating to transport issues.

The SA report seems to give a large weighting to the transport connectivity of Berkhamsted. While Berkhamsted is served by a very good rail service, that service was at capacity (pre-pandemic) I take issue with bus services being portrayed as good.

The “high frequency bus service (No.500)” referred to in C31 only operates 3 buses per hour Monday-Friday, 2 buses per hour on Saturdays and a single hourly service during Sunday shopping hours. There is no evening service or early services on Saturdays, while it also suffers reliability issues due to its length.

Berkhamsted does not have a sustainable transport system in place and promoting growth on valley side and ridge-top Green Belt locations will only reduce those sustainability credentials further.

On a different aspect of sustainability, water supply in this area is constrained being supplied by the local aquifer which also feeds our Chalk Streams. The Environment Agency says that abstraction is to be restricted to 'current' levels. This poses a challenge to the Infrastructure Plan and is a critical aspect of the proposal to increase dwelling numbers by over 20% in this locality. New supplies of water for this area are not likely to be possible until after 2030.

The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This could take 10 years plus.

Taking a more critical view, the DBC Sustainability Appraisal (SA) report Appendix C does identify the chronic issues revolving around water and wastewater, but there is nothing in the plan to address these issues. DBC's usual answer is that "developers have a right to connect and development cannot normally be resisted on the grounds of inadequate water supply or sewerage capacity."

I amongst others would query whether the Borough is correct in this respect. Things may have moved on but I understand that in the 70's there was a moratorium on house building in South Devon until improved sewage disposal facilities were built, and in Herefordshire due to pollution there is a moratorium on all house building in the River Lugg's catchment area.

Overall, the SA report suffers from the usual confirmation bias traits that accompany analysis that requires specific outcomes to be justified. It looks like the DBC plan is about how to hit a target given rather than considering good planning for the right houses in the right places.

Included files

Title Question: Sustainability Appraisal

ID EGS5954

Person ID 1262737

Full Name Andrew Cassels

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION: Sustainability Appraisal comment The infrastructure developmet needs advnced and complimented with a reduction of house numbers.

Included files

Title	Question: Sustainability Appraisal
ID	EGS5977
Person ID	1151388
Full Name	Mrs Aileen MCVEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS6007

Person ID	1264809
Full Name	Sue Selfe
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal

ID	EGS6027
Person ID	1264822
Full Name	JULES GARNER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<ul style="list-style-type: none"> Flood risk - having lived in Berkamsted for a long time there is increasing evidence that the infrastructure already can not cope and we regularly see This is prevalent throughout the valley including around the Station where, despite major overhaul last year, it still floods. Building even more properties is going to undoubtedly make this worse There is still as lack of data on how we are going to ensure the Air Quality is protected and Berkhamsted can target net zero
Included files	
Title	Question: Sustainability Appraisal
ID	EGS6288
Person ID	1264834
Full Name	Ilina Jha
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	

Included files	
Title	Question: Sustainability Appraisal
ID	EGS6406
Person ID	1264750
Full Name	Neil Joyce
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS6431
Person ID	1264964
Full Name	Philip Heaphy
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<i>We have concerns about water supplies to meet the requirements of the target number on new houses, in particular the pressure on the chalk aquifers and the health of the River Gade and River Bulbourne if extraction is increased. Comments have already been made about the risk of increased traffic density along the B440 and surrounding villages.</i>

Included files	
Title	Question: Sustainability Appraisal
ID	EGS6471
Person ID	1264982
Full Name	Rachel Heaphy
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<i>We have concerns about water supplies to meet the requirements of the target number on new houses, in particular the pressure on the chalk aquifers and the health of the River Gade and River Bulbourne if extraction is increased. Comments have already been made about the risk of increased traffic density along the B440 and surrounding villages.</i>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS6481
Person ID	1264984
Full Name	Jason Bennett
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	The plan is based on flawed requirements responding to a requirement since modified by Central Government. An increase of over 50% of housing and community in a short time frame will place undue stress on many aspects of the community which are not actually sustainable. The plan responds to requirements that are modified and flawed.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS6496
Person ID	1264951
Full Name	Chris Perks
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS6607
Person ID	494770
Full Name	Mr John Borton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	I just dont see how the Council can claim that the use of 'greenfield' land is being minimised when three quarters of the additional housing will be on greenfield or Green Belt sites. With the impact of Covid and the failure of commercial ventures along the High Street there are more opoportunities for mixed-use living developments in the central area of the town.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS6640
Person ID	1265007
Full Name	Duncan Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS6701
Person ID	1264923
Full Name	Ken Douglas
Organisation Details	Secretary TRING IN TRANSITION
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

- * Yes
- * No

QUESTION: Sustainability Appraisal comment

Table 4-1: Key sustainability Issues and Opportunities

- *‘Ashridge SAC/SSSI, Tring Park, Tring Reservoirs and the Grand Union Canal are all reported to be experiencing visitor pressures. As the urban population increases, pressures on access to the countryside and these key attractions will increase.’* Yet there is no further mention of these in the Plan and no proposed mitigating action.

Section 5.5 ‘The Council’s preferred approach’

- Page 43. A stated consideration is *‘minimising, where possible, adverse impacts on the highway network and seeking to maximise opportunities for supporting sustainable modes of travel’*. As I noted previously, the options for both road connections and sustainable travel have NOT been adequately explored for a Tr03/Tr02, in particular. The north–south road, connectivity has not been considered beyond vague notions that something will be required. **This is nowhere near concrete enough.**
- On page 46, *‘[the Council] considers the allocation of 1,400 homes at East of Tring will enable significant amounts of public open space to be provided, including a new public park of around 20 hectares on land classified as Grade 2. The Council considers that these requirements mitigate the impact that development would have on this particular objective.’* Twenty hectares is less than one sixth the area of the existing Tring Park, which elsewhere in the same document (Page 16) is already reported to be suffering from ‘visitor pressures’. The provision of 20 hectares of public park is inadequate, especially coupled with the lack of further mitigating action for developing on Green Belt land and the absence of any joined-up plan for linking other green spaces impacted by the proposed developments.
- The following is identified as a ‘key sustainability issue’: *‘Ashridge SAC/SSSI, Tring Park, Tring Reservoirs and the Grand Union Canal are all reported to be experiencing visitor pressures. As the urban population increases, pressures on access to the countryside and these key attractions will increase.’* Yet there is no further mention of these in the Plan and no proposed mitigating action
- We disagree strongly with the conclusions reached with respect to Tring on several of the stated The conclusions reached are not consistent with the reasons given, place insufficient emphasis on mitigating negative aspects and contradict other stated conclusions – as expanded upon in the following sections.
- Page 43. A stated consideration is *‘minimising, where possible, adverse impacts on the highway network and seeking to maximise opportunities for supporting sustainable modes of travel’*. As noted elsewhere in this response, the options for both road connections and sustainable travel have NOT been adequately explored. In particular for a Tr03/Tr02, north– south road, connectivity has not been considered beyond vague notions that something will be required. This is nowhere near concrete enough.
- On page 46, *‘[the Council] considers the allocation of 1,400 homes at East of Tring will enable significant amounts of public open space to be provided, including a new public park of around 20 hectares on land classified as Grade 2. The Council considers that these requirements mitigate the impact that development would have on this particular objective.’* Twenty hectares is less than one sixth the area of the existing Tring Park, which elsewhere in the same

document (Page 16) is already reported to be suffering from 'visitor pressures'. The provision of 20 hectares of public park is wholly inadequate, especially coupled with the complete lack of further mitigating action for developing on Green Belt land and the absence of any joined-up plan for linking other green spaces impacted by the proposed developments.

Included files

Title Question: Sustainability Appraisal

ID EGS6709

Person ID 1265042

Full Name Brian killin

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment Pages 333 to 335 Section F of the appendix.
 I'm staggered by the area propped for development given the availability of far more suitable land, i.e. not flooded half the year, around the two nearby airfields which are both on much higher ground and are already brownfield sites.
 The fact that there is a possibility of people being forced to sell their land to enable this proposal to go ahead is abhorrent to me as an ex-Zimbabwean where the appropriation of land has led to disaster for the economy. I can just about understand it for HS2 as that is where the line is going but this is going too far.

Included files

Title Question: Sustainability Appraisal

ID EGS6710

Person ID 1265043

Full Name Roberta Migale

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	
Included files	
Title	Question: Sustainability Appraisal
ID	EGS6739
Person ID	1227391
Full Name	mrs caroline shaughnessy
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have just read that there is a planned development of 30 dwelling in Ebberns Road - This Road is unable to take anymore traffic, it is congested and dangerous and can bearly provide enough parking for the pre war built houses (Cottages with no ability to have driveways installed). If anything there should be an area made to provide parking for the established residents and the vulnerable adults bungalows that need parking for they are disabled or have mobile careres and family visiting .</p> <p>It also sits within the Pollution Zone monitored area AQMAs.</p> <p>Whilst I support the majority of the vision here is one example that totally discredits the Councils ability to think of the residents health and wellbeing = There are many an area with no issues that would be more suitable - I will be contacting the local MP regarding this proposal - Do something positive for the established residents who seem to get overlooked</p>

! Cancel or Reduced development and create parking for the roads existing residents to make the road safer - there is no other parking facilities in that area. please re think !

Included files

Title Question: Sustainability Appraisal

ID EGS6834

Person ID 1265036

Full Name Tom Burrows

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTION: Sustainability Appraisal comment

Included files

Title Question: Sustainability Appraisal

ID EGS6997

Person ID 1263321

Full Name TSEL Secretary TSEL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION: Sustainability Appraisal comment	<p>Of all the considered within the Sustainability Appraisal, Tornadoes considers SA10: Health & Wellbeing the most important.</p> <p>Within the DBC Interim Sustainability Appraisal Report – November 2020, 6.4.11 SA10: Health and Wellbeing, Tornadoes agrees with the premise as set out. Tornadoes could not find any evidence or detail set out that explains what the significant positive effects that have been identified for Tring are in relation to:</p> <p>6.4.11 SA10: Health and Wellbeing</p> <p><i>Significant positive effects have been identified against the Development Management policies relating to the ‘Healthy Communities’ theme (‘DM59 Health Facilities’, ‘DM60 Health Impact Assessments’, ‘DM61 Education’, ‘DM62 Sport and Leisure’, ‘DM63 Open Space Provision’, ‘DM64 Community Facilities’ and ‘DM65 Community Stewardship and Management’).</i></p> <p>Tornadoes is keen to see the detail set out that explains what the significant positive effects that have been identified for Tring are.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7051
Person ID	1263561
Full Name	Alexander Bhinder
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Too late to elaborate.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7148
Person ID	1265133

Full Name	Sarah Storey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Please see comments above. Proposed development in Tring is unjustifiable and unsustainable.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7229
Person ID	1265124
Full Name	Jim Eite
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I strongly object to the Tring Delivery Strategy and the Local Plan which proposes 16,600 new homes to be built primarily on 850 hectares of green belt around Tring, Berkhamsted and Hemel Hempstead in the next 18 years.</p> <p>This growth in household numbers is a 25% increase over the current housing, which would irrevocably change the character of our towns and villages and destroy valuable green belt habitat and amenity. Dacorum Borough have chosen to accept these Central Government imposed growth figures that are not substantiated by evidence and are based upon outdated ONS projections and an arbitrary and misguided algorithm.</p> <p>I support the need for a local plan and accept the need to build a reasonable number of new, sustainable and affordable properties in the Borough. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% FEWER</p>

than this plan projects. This figure post-pandemic is also likely to decrease as housing stock is created in urban centres as many businesses reduce overheads and costs, and exit to a more remote working environment.

In this plan, thousands of new homes are simply bolted onto the perimeters of our existing towns over green belt land with inadequate thought to the pressures on water supplies, traffic needs, medical facilities, education, recreation, recycling centres and employment needs (to name but a few crucial infrastructure requirements). There is little sustainable about the construction nor preserving of our heritage about this plan.

Rather than as an afterthought, sustainability should be at the absolute core of the proposed future developments in the Local Plan - this is recommended by national planning guidance and should be a given in the current climate. This draft Local Plan fails to demonstrate a pathway to local zero-carbon or enhancements to biodiversity. The plan is woefully unambitious and does not commit to any level of sustainability in its targets. The proposed plan has clearly prioritised house building growth and money/construction companies over considerations for the very real climate emergency we all face.

Several local authorities in England (e.g., Greater Cambridge, Reading and Liverpool City) have developed integrated local plans that take account of climate change, biodiversity, well-being and social inclusion. Beyond some hyperbole, there is no evidence in the proposed Local Plan of any viable action to deliver such an approach.

We must ensure the Local Plan commits to all new homes to be certified zero carbon and sustainable in order to address the climate emergency.

I, along with many of my fellow Tring residents call for:

- The number of new houses proposed in the plan to be substantially reduced.
- Dacorum to implement a local plan that includes firm and ambitious sustainable commitments. I believe all new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.
- I call for the 40% minimum affordable homes objective to be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.
- Trees and woodland are very valuable to the environment and the community's physical and mental health. I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, each new major development area.
- An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.
- Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside boundaries. These

routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.

- The Local Plan should allocate land for new allotments for residents of new homes as well as laying out gardens to support 'Growing your own'(which is both sustainable and good for mental health)
- Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be widened. Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.

We are facing a climate emergency and addressing this must be at the absolute core of Dacorum's Local Plan. Currently it is not. We have the knowledge and technology to make good affordable zero carbon sustainable homes. The Local Plan must prioritise this.

Included files

Title Question: Sustainability Appraisal

ID EGS7274

Person ID 1261685

Full Name Ian Edwards

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Sustainability Appraisal comment

Included files

Title Question: Sustainability Appraisal

ID EGS7294

Person ID 1265179

Full Name JANE DAWSON

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7332
Person ID	864107

Full Name	Mr Antony Hetherington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site' s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “ East of Tring” fails to meet the efficient use of land objective and yet this isn' t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7343
Person ID	1207259

Full Name	Mr Graham Bright
Organisation Details	Chairman Grove Fields Resident Association
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>The fields of Tr02 and Tr03 to the east of Tring should not be developed. Tr02 and Tr03 are home to large amounts of wildlife, they provide a wildlife corridor between the reservoirs and Ashridge woods. Within these fields it is common to see wild deer and foxes roaming - the wild deer have travelled from Ashridge woods to graze in these fields. In addition, there are many species of birds including many varieties of birds of prey. These animals habitats will be decimated with the construction 1,800 houses, schools, supermarkets and lots of other infrastructure. Tr02 and Tr03 are too close to the Ashridge woods and AONB to be built upon without causing huge amounts of damage to the roaming and survival of the wildlife. Without a full wildlife assessment of the land the plan is not ready for consultation.</p> <p>The land Tr02 and Tr03 is liable to flooding as we have witnessed in January and February 2021 with waterlogged fields overflowing and leading to a river running down Marshcroft Lane. If there is development of this land it will inevitably lead to flooding of the land developed and flooding of the houses already adjacent to Tr02 and Tr03. Without a full flood assessment of the land the plan is not ready for consultation.</p> <p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p>

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Included files

Title Question: Sustainability Appraisal

ID EGS7410

Person ID 1265377

Full Name PHILIP MOORES

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Included files	
Title	Question: Sustainability Appraisal
ID	EGS7423
Person ID	1265380
Full Name	JON WRIGHT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site' s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS7435

Person ID 1265381

Full Name DR SUE DAVEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn’ t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site’ s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Included files

Title Question: Sustainability Appraisal

ID EGS7582

Person ID 1265614

Full Name JACKIE BARKER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS7611

Person ID 1143218

Full Name Mr Terry Cartmell

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn’t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site’s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS7623

Person ID 1207710

Full Name Penny Bennetts

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment The Sustainability Appraisal highlights many aspects of the plan that can be improved with careful attention and also the damage that will be caused by developing greenfield land. If fewer homes are built the level of harm will decrease. I urge the council to look at this again.

Included files

Title Question: Sustainability Appraisal

ID EGS7641

Person ID 1265748

Full Name	Mr Roger McVey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7656
Person ID	1265752
Full Name	Mrs Flora Moores
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as " East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7675
Person ID	1261784
Full Name	Nigel Vanner
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7688
Person ID	1265757
Full Name	JENNIFER GAIL FREER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<ul style="list-style-type: none"> • Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. • Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. • This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7700
Person ID	1265614
Full Name	JACKIE BARKER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “ East of Tring” fails to meet the efficient use of land objective and yet this isn’ t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS7715

Person ID 1265765

Full Name Miss Inma Rodriguez

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn’ t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site’ s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific

basis, there is recognition that the land defined as “ East of Tring” fails to meet the efficient use of land objective and yet this isn’ t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.
 Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS7742

Person ID 1265778

Full Name Councillor Lara Pringle

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * **Yes**
 * **No**

QUESTION: Sustainability Appraisal comment Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.
 Residents report that they already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.
 This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.

Included files

Title Question: Sustainability Appraisal

ID EGS7819

Person ID 1265909

Full Name	Peter Evans
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I do not believe that the actions proposed within the Plan for Tring meet sustainability aims. It does not give sufficient evidence for the need for extensive housing/loss of important countryside nor give detailed commitment to mitigating strategies.</p> <p>The plan identifies that a key sustainability issue is that 'Ashridge SAC/SSSI, Tring Park, Tring Reservoirs and the Grand Union Canal are all reported to be experiencing visitor pressures. As the urban population increases, pressures on access to the countryside and these key attractions will increase.' My experience is that the pandemic has increased the use of these areas considerably and that this use is likely to continue as the benefits for peoples physical and mental wellbeing are clear. I believe that the impact of local traffic increase, pollution and visitor numbers would have a very negative impact on these sites and that of Tring Park SSSI. The impact of these should be considered alongside housing need.</p> <p>Government policy seems clear that councils have responsibilities for assessing housing need alongside local environmental concerns rather than the former trumping the latter. The planned provision of public park of around 20 hectares would in no way compensate for the loss of open land/countryside on Green belt land, and would further impact on the above areas.</p> <p>On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results.</p> <p>Why is this? The land to the East of Tring is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7836
Person ID	1265915

Full Name	Mr Stephen Trueman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7890
Person ID	1265985
Full Name	PAUL ELLERAY

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7973
Person ID	1266006
Full Name	SUE ELLERAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS7999
Person ID	1266015
Full Name	SOPHIE WHITTON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	a)Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS8047
Person ID	1152837
Full Name	Suzanne Jannese
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Whilst accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, I have serious concerns regarding the sheer scale of proposed development.</p> <p>The Council has failed to take account of National Planning Policy Framework (NPPF), paragraph 11, footnote 6 which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>I also acknowledge that recent Government guidance on calculating housing need has been, at best, confusing. I firmly believe that housing needs should be based on the most recent and relevant data, which is currently the 2018 based Office for National Statistics (ONS) projections. The Council has based its calculations on the outdated 2014 based ONS data which, in my opinion, would result in a significant overestimate of housing and brings into question the soundness of any local plan based on them.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS8072
Person ID	1266048
Full Name	RACHEL MORGAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.

Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.

This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.

Included files

Title Question: Sustainability Appraisal

ID EGS8243

Person ID 1266155

Full Name Annabel Carroll

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.

Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.

This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.

Included files

Title Question: Sustainability Appraisal

ID EGS8287

Person ID 1266170

Full Name Philip Hill

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>Please take this email as my formal response to Dacorum's Local Plan (2020-2038) Emerging Strategy for Growth.</p> <p>I do not agree that 16,000 houses should be in the plan and believe you should be using up to date figures which would halve that number to around 8,000 houses.</p> <p>The current pandemic has shown how important our local green spaces are and that our green belt land must be protected. I do not believe that inflated housing need is an exceptional circumstance for removing Dacorum's green belt.</p> <p>Green belt land helps protect the shape, size and character of towns and villages preventing them merging into one another.</p> <p>This plan underestimates the potential for brownfield regeneration opportunities which have increased due to the pandemic with more people working from home.</p> <p>The plan does little to address the improvements on infrastructure that will be needed to support 16,000 new houses. We currently have no hospital, functioning police station or sufficient schools & residents parking.</p> <p>I understand that we don't have enough water to supply all the extra houses. I believe from what I have read that the extra water needed can only be extracted from the chalk aquifer which in turn will damage the borough's chalk rivers which are classified as priority habitats by the Natural Environment & Rural Communities Act 2006.</p> <p>I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS8294
Person ID	1266171
Full Name	Patrick and Gillian Wilks
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>We wish to object to the plan for the following reasons.</p> <ol style="list-style-type: none"> 1 Although emphasising green spaces the plan increases housing by 25% and uses 2000 acres of valuable Green Belt and open spaces across the borough. If Covid has taught us anything it is that Green spaces are vital and must be kept in our local community. 2 Impact on Green Belt & Chiltern area of Outstanding Natural beauty (AONB). The scale of the proposed housing will have a detrimental impact on the natural environment 3 Underestimating Brown field potential (Q2 of consultation). Although the plan includes some brownfield suites the major housing developments are on the outskirts of Hemel, Berkhamsted and Tring. The plan fails to take into account the impact of Covid and recent working from home changes; in the near future more office and work sites may become available. <ol style="list-style-type: none"> 1 Unsustainable development (Q3 of the consultation) Focusing building on the outskirts of the main towns means that the developments are some distance from existing transport infrastructure. This will result in several thousand more cars on local roads. 2 More congestion on the roads, particularly impacting Potten End. The plans suggest traffic coming from Tring and Berkhamsted would use the new link road in North Hemel from the Dagnall road (B440) to J 8 on the M1, rather than using the old link road through Hemel. This is so close , the new link road is an unnecessary addition. Also there is no way for the traffic to get to the A41 From the B440. The route would take you up through Potten End and then the narrow streets of Berkhamsted. The leight on buzzard road is often queuing in the rush hour times at the moment especially to go over the bridge at Water End. The proposal would worsen this situation. It is unacceptable. 3 Water supply and waste water disposal (Q6) The chalk aquifer is already over abstracted and local residents are aware of the fragility of the water supply. The level of the new housing will put a severe strain on supply and disposal. There is the potential to damage the boroughs precious chalk streams. Dacorum and affinity water have recently spent time and money on improving the River Gade only for this plan to put it at risk. <p>We strongly object to the number of houses and the Motorway link proposed. The plan is based on figures the the government has now withdrawn. The plan should be based on the most recent ONS figures from 2018 which suggest a housing target for Dacorum of c. 500 houses pa, this is half the figure on which the plan is based.</p>
Included files	
Title	Question: Sustainability Appraisal

ID	EGS8415
Person ID	1266234
Full Name	LUCY DUGDALE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>> 6/ Do you have any comments on the sustainability of the proposal?</p> <p>> Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>> Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>> This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS8449
Person ID	1266276
Full Name	BARBARA ANSCOMBE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS8474
Person ID	495878
Full Name	Ms Anna Hanson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	Some concerns include Increased Flood Risk

Again because Berhamsted is situated in a valley during heavy rain and storms the drainage infrastructure often cannot cope. I have seen the road outside my house on many occasions turn into a small river, the tarmac has been lifted and even main drains burst. Anything that reduces the ability of the land to drain and hold water at the top of the hills should be rejected. These sites are situated at valley tops and would lead to more water runoff effecting those lower down the hills.

Air Quality

The plan needs to provide a comprehensive analysis to ensure we have a plan which ensures the reduction of air pollution. Sites should discourage car use, encourage walking and any development should have net zero emissions.

Included files

Title Question: Sustainability Appraisal

ID EGS8484

Person ID 1266302

Full Name Gareth Garner

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

- Flood risk - having lived in Berkamsted for a long time there is increasing evidence that the infrastructure already can not cope and we regularly see This is prevalent throughout the valley including around the Station where, despite major overhaul last year, it still floods. Building even more properties is going to undoubtedly make this worse
- There is still as lack of data on how we are going to ensure the Air Quality is protected and Berkhamsted can target net zero emmissions

Included files

Title Question: Sustainability Appraisal

ID EGS8500

Person ID 1266311

Full Name	Dr Gwynneth Down
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>Throughout this document I have described why I disagree strongly with the developments in Tring in relation to sustainability. Conclusions are not backed up by sufficient evidence or detail/commitment given to mitigating strategies.</p> <p>The plan identifies that a key sustainability issue is that '<i>Ashridge SAC/SSSI, Tring Park, Tring Reservoirs and the Grand Union Canal are all reported to be experiencing visitor pressures. As the urban population increases, pressures on access to the countryside and these key attractions will increase.</i>' My experience is that the pandemic has increased the use of these areas considerably and that this use is likely to continue as the benefits for peoples physical and mental wellbeing are clear. I believe that the impact of local traffic increase, pollution and visitor numbers would have a very negative impact on these sites and that of Tring Park SSSI. The impact of these should be considered alongside housing need.</p> <p>Government policy seems clear that councils have responsibilities for assessing housing need alongside local environmental concerns rather than the former trumping the latter. The planned provision of public park of around 20 hectares would in no way compensate for the loss of open land/countryside on Green belt land, and would further impact on the above areas.</p> <p>I also have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon.</p> <p>This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under</p>

Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS8515

Person ID 1265044

Full Name Joseph Price

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment The scale and nature of the proposed developments at Tr03, on Green Belt land that we will never, ever get back, are inherently contradictory to 'sustainable development' and any attempts to 'mitigate and adapt to climate change' (one of the objectives of the local plan).

Included files

Title Question: Sustainability Appraisal

ID EGS8555

Person ID 211354

Full Name Mrs Laura Sanderson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>DBC ignores the post-pandemic effects. It grossly underestimates windfall developments, it does not assess the use of brownfield sites or the in-filing that could easily take place in Hemel Hempstead where there are large areas pf unused mown grass (not environmentally beneficial – no meadow flowers etc.) and poorly maintained public open spaces that are scarcely used. All of these could provide excellent affordable terraced housing without encroaching on the Green Belt and make proper use of existing transport and civic facilities.</p> <p>I endorse everything said here by CRPE and BRAG with the proviso that there should be much much more infilling within Hemel Hempstead to balance the housing density in the various towns in the Borough.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS8621
Person ID	1266595
Full Name	SHARON MACARTHUR-POWELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>6/ Do you have any comments on the sustainability of the proposal?</p> <p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal

ID	EGS8631
Person ID	1266604
Full Name	SEB BELOE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	6/ Do you have any comments on the sustainability of the proposal? Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS8645
Person ID	1266607
Full Name	RACHEL POWELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS8662
Person ID	1248896
Full Name	Ashleigh Genco
Organisation Details	Harrow Estates plc
Agent ID	1258542
Agent Full Name	Samantha Ryan
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Harrow agrees with the overall findings of the Sustainability Appraisal, which point to a strategy of balanced growth across the main settlements in the borough, including large-scale expansions on the edge of those towns, as the most sustainable option to meet the development needs of Dacorum. Informed by the Settlement Strategy (2017), the Sustainability Appraisal recognises that the larger settlements , including Tring, contain a wide range of facilities to support their own communities and surrounding settlements. They are also well-served by public transport infrastructure, including railway stations.</p> <p>Harrow has reviewed the Sustainability Appraisal for the draft allocation of land east of Tring (Tr03) and has comments relating to its scoring against the following SA objectives. Harrow has not reviewed the appraisal of other sites against the SA objectives and reserves the right to do so in due course.</p> <p>1. Biodiversity</p> <p>The preliminary chapters of the SA recognise that the significance of effects on biodiversity is dependent on the biodiversity value of the development sites, irrespective of whether they are greenfield or previously developed land. It goes on to recognise that new development provides opportunities for habitat enhancement and connectivity, particularly on large</p>

sites and, in particular that: “The provision of SANGs as part of large new developments would help to reduce recreational pressure on the Chilterns Beechwoods SAC, particularly at current ‘honeypot’ locations such as the Ashridge Estate”.

Harrow agrees with those overarching conclusions and is, therefore, disappointed that land east of Tring receives a negative score by virtue of being a large greenfield site ‘where there would be some loss of habitats’. In 2014 Harrow commissioned a phase 1 habitat survey of the land and annual ecological surveys have subsequently been conducted. Those reports demonstrate that the land is currently in agricultural use and of limited ecological value – with any such value being largely confined to existing mature hedgerows to fields south of and along Marshcroft Lane. Those hedgerows can be retained within a new enhanced green network as part of the development, offering positive benefits against this SA objective. Copies of the detailed ecological appraisal studies are enclosed and we trust the council will use those to amend the assessment of the site against this SA objective.

The SA recognises the opportunity that the allocation offers to provide SANGS and offers a minor positive rating against that objective. The illustrative masterplan demonstrates that the extent of SANGS is substantial and across the site there are significant opportunities to provide biodiversity net gain. The site should be awarded a major positive rating against that objective.

6. Soils

The SA states that the majority of the site comprises Grade 2 agricultural land and, therefore, awards a major negative score for the site against this SA objective. The source of this conclusion is not clear; however, Harrow recognises that it is unlikely detailed soil analysis has been carried out for each site. Harrow has commissioned an independent study of the site by Reading Agriculture; including detailed soil sampling and laboratory analysis. It confirms that the majority of the land is, in fact, lesser quality Grade 3 land with areas of Grade 2b. A copy of the Agricultural Land assessment is enclosed and we trust that the council will use that to amend the assessment of the site against this SA objective.

8. Historic Environment

The site does not contain any designated heritage assets or non-designated assets. The setting of adjacent heritage assets has been considered in preparing the illustrative masterplan for the site. While there is evidence of some crop markings south of Marshcroft Lane, an archaeological report prepared on behalf of Harrow demonstrates that they are likely to be of limited significance and , in any event, could be retained in situ as part of the development. The impact on heritage assets is, therefore, likely to be neutral and the assessment of the site against this SA objective should be amended to reflect this.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS8800
Person ID	1261814
Full Name	Liz Uttley
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Water</p> <p>Simply put, we have a problem here in Dacorum with availability of water for peoples' homes and businesses. The River Gade ran dry in 2019, and later that year, the Council passed a unanimous motion to protect the Chalk Streams, as an internationally significant biodiversity asset. As noted above, although DM33 states a need to avoid extracting water from the ground, in particular our chalk streams, it is very difficult to see how this can be managed, with such an accelerated house building plan.</p> <p>The Chalk streams must be protected.</p> <p>Climate</p> <p>The UK has a target of reaching net zero carbon by 2050. However, some industries are extremely difficult to decarbonise, for example, airlines, and certain areas of manufacturing. As a result it is essential that where the solution is known, these actions be taken as quickly as possible.</p> <p>There are lots of things that can be done to reduce the carbon footprint of Dacorum, and it is essential that any house building programme include as many of these as possible. There are lots of positive ideas in the Local Plan to help tackle climate change, but in reaching net zero, the first thing that must be considered is measurement. The removal of land from the green belt will reduce carbon sequestration from soils and plant life within our borough. The value of this carbon needs to be included when working towards net zero.</p> <p>House builders should also be required to calculate the carbon costs of construction, including, but not limited to, building materials, transport of materials, and equipment use. On top of this the carbon costs of use of the dwellings should be worked out, and confirmed once in use, and the carbon cost of disposal or recycling of the homes.</p> <p>It is also essential that when we say that we are building homes in sustainable places, we are not suggesting that every place in (for example) Hemel is equally sustainable. New communities which are far from the train station, and in fact located close to large roads, will encourage car dependent communities unless significant steps are taken to ensure alternative transport is available.</p> <p>Biodiversity</p> <p>It is welcome that this Local Plan includes provision for 10% net biodiversity gain, however it must be noted that this is an extremely challenging task when taking land out of greenbelt, and where this happens, it will be necessary for the Developer, the Council and other stakeholders to work very hard to produce a plan that can provide this.</p>

I would also like to see 10% net biodiversity gain for all infrastructure and non-housing projects across the borough.

Transport

As noted above, there are many proposed locations in this plan which are in desperate need of a detailed transport plan which is put in place in an appropriately phased manner to prevent the developments becoming car dependent dormitory communities.

To date, housing is not generally built with transport in mind, but this must be a priority in the future. Road layouts should be decided based on encouraging bus, train and cycle use. In certain areas in Dacorum these would need to be electric cycles due to topography, and so if large housing estates are put in location which would require significant hill cycling, then buses will become more important, unless electric cycles become affordable, or a scheme can be put in place.

Many of the proposed locations such as the green belt north and east of Hemel, are not in sustainable locations. If recent proposals are a guide, then it is likely that these will be largely executive housing, and we must acknowledge that the people that can afford this housing, which is likely to be many times the affordability ration used by the ONS (4 times average salary) will probably be working in London. On top of this they will be able to afford cars, and if commuting, will want to drive to the train station. As a result, this plan risks placing people that can afford a car, and are most likely to need the train station, at too great a distance to walk to the station, and without reliable public transport. To avoid these people having to use a car to get to work every day, and the resultant impacts on our traffic and net zero obligations, our public transport and cycling routes would require enormous investment. Dacorum's roads cannot hold any further traffic, and certainly not 20% more.

The Draft Infrastructure Delivery Plan ('IDP') lays out a hierarchy of road users, and requires any transport strategy or scheme to consider in the following order:

1. Opportunities to reduce travel demand and the need to travel
2. Vulnerable road user needs (such as pedestrians and cyclists)
3. Passenger transport user needs
4. Powered two wheeler (mopeds and motorbikes) user needs
5. Other motor vehicle user needs

This is welcome, but it must be matched with policies elsewhere. For example, in the draft IDP there is a categorisation of infrastructure spending as critical, essential and required, and also (Tables 8, 9 and 10) a further classification of transport schemes as of 'major relevance', 'lesser relevance' and 'local'. Only those schemes classified as of 'major relevance' are in the 'critical' category, and schemes of lesser relevance are largely 'green' infrastructure.

To date, Garden Communities projects across the country have failed to bring the green communities their name promises. The largest proportion of money in these projects has been spent on roads, and unless steps are taken to prevent road infrastructure being prioritised over other infrastructure when looking for funding, then we will fall into this same trap. Smaller cycle ways and other alternative green transport infrastructure should not be competing against large road improvement infrastructure, which has often been planned for many years, without availability of funding. Garden Communities projects should not simply be a process by which this funding is gained, if they are, then they will further exacerbate climate change, rather than help to mitigate it.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS9167
Person ID	211352
Full Name	Mr Andrew Sanderson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Yes I have comments. DBC ignores the post-pandemic effects. It grossly underestimates windfall developments, it does not assess the use of brownfield sites or the in-filing that could easily take place in Hemel Hempstead where there are large areas of unused mown grass (not environmentally beneficial – no meadow flowers etc.) and poorly maintained public open spaces that are scarcely used. All of these could provide excellent affordable terraced housing without encroaching on the Green Belt and make proper use of existing transport and civic facilities.</p> <p>I endorse everything said here by CRPE and BRAG with the proviso that there should be much much more infilling within Hemel Hempstead to balance the housing density in the various towns in the Borough.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS9212
Person ID	1267203
Full Name	Ms Eileen Martin
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Yes. Release of Green Belt, which is meant to prevent towns coalescing, would be irreversible.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS9266
Person ID	1267329
Full Name	MARTIN DAVIES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS9275
Person ID	1267330

Full Name	Kat Worth
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS9322
Person ID	1267332
Full Name	Nandi Jordan
Organisation Details	Chair Berkhamsted and Tring Labour Party
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

**QUESTION: Sustainability
Appraisal comment**

As stated in the Sustainability Appraisal: “any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects

... relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants”

Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure

There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.

Biodiversity (SA Objective 1)

Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land.

Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.

Flood Risk (SA Objective 3)

SA states it has found ‘no predicted effects’ against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road, floods regularly (please see picture below taken in January 2021).

Photo of area for development taken by a local resident (no copyright) ATTACHED TO COMMENT

Greenhouse gas emissions (SA Objective 4)

The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

Air Quality (SA Objective 5)

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites which do not encourage car use or increase congestion;
- the creation of a robust electric transport network;
- planning which ensures net zero emissions from new developments; and

- the creation of carbon fixation via rewilding and protection of natural habitats.

Landscape & Townscape (SA Objective 9)

The SA and Plan sites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring, in terms of, design and site selection.

Housing (SA Objective 13)

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types and sizes of home (a minimum of 35% to be affordable housing), however, affordable needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will be less pressure to build on the greenfield sites.

Included files [attachment to comment EGS9322.jpg](#)

Title Question: Sustainability Appraisal

ID EGS9353

Person ID 1267365

Full Name Mr Jont Cole

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a

particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would

clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS9368

Person ID 1267367

Full Name Sarah Johnson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment

Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.

Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.

This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.

Included files

Title Question: Sustainability Appraisal

ID EGS9382

Person ID 1267368

Full Name Peter Leighton-Murray

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.
Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.
This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.

Included files

Title Question: Sustainability Appraisal

ID EGS9396

Person ID 1267370

Full Name Patricia Beloe

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS9445
Person ID	1267398
Full Name	Alexandra and James Donaldson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	

Title	Question: Sustainability Appraisal
ID	EGS9454
Person ID	1267401
Full Name	JACKIE BELLAMY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<ul style="list-style-type: none"> • Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. • Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. • This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS9484
Person ID	1267417
Full Name	Wendy and Paul Goodridge
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
QUESTION: Sustainability Appraisal comment	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS9487
Person ID	1157289
Full Name	Rodney O'Callaghan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under</p>

Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS9650

Person ID 400471

Full Name Mrs Ruth Constable

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment The Climate Crisis should be at the forefront of all discussions about development. There continues to be a severe impact upon the planet of environmental destruction. The environmental impact of building 1800 homes plus two primary schools and a secondary school on sites TR02 and TR03 has not been properly assessed. By any measure this is a large development for a small town and, I think, disproportionate. It is not sustainable development.

TR2 and TR3 are beautiful open areas, lying at the foot of the Chilterns AONB and the wooded slopes of Ashridge; building on them would cause irreversible and permanent damage to the environment and the wildlife living there.

The cumulative effect of building on several sites in Tring, including TR02 and TR03 which adjoin, has not been addressed.

Included files

Title Question: Sustainability Appraisal

ID EGS9683

Person ID 1267468

Full Name Chris Berry

Organisation Details	CPRE Hertfordshire
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	The results of the Sustainability Appraisal (SA) are of course directly related to the quantum and location of proposed development throughout the Borough. Given our significant objections to considerable areas of the Strategy, as already noted, it will be necessary to revise the SA very considerably to reflect policies and projects which are supported by evidence and the results of consultation as required by planning legislation.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS9794
Person ID	1267544
Full Name	CATHERINE HAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>

Included files	
Title	Question: Sustainability Appraisal
ID	EGS9829
Person ID	
Full Name	
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>

Included files	
Title	Question: Sustainability Appraisal
ID	EGS9857
Person ID	1267744
Full Name	GARETH BELLAMY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<ul style="list-style-type: none"> • Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. • Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. • This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10089
Person ID	1268034
Full Name	MR IAN GUNTER-JONES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a comm entary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard to the structure of the scoring system which isn't broken down beyond opinion raised against heading</p> <p>1 This is an issue as when assessing individual sites; the assessment has brought forward an asses sed position only with regard to that site's relationship with the existing physical landscape independ ently and fails to take into consideration any cumulative impact of multiple sites being built upon. Thi s is a particular issue for the assessment with regard to Tring, given that the intended allocation strat egy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locali ty that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impa ct; that which would be expected to be assessed within applications wherein an Environmental Impa ct Assessment is required.</p> <p>On a site specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Nat ural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this s pace will cause irreversible and substantial harm that cannot be reversed or mitigated for and for whi ch development has not been justified. Nothing raised within the Sustainability Appraisal identifies th at this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10107
Person ID	1268045
Full Name	C PERRY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required.</p> <p>Land that is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area should not be built on. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10123
Person ID	1146091
Full Name	Mr John Foster
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10162
Person ID	1268071
Full Name	LINDA SLIM
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10313

Person ID	1268339
Full Name	Mr Adam Craig
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Do you have any comments on the sustainability of the proposal?</p> <p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents, including ourselves, already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10322
Person ID	1268350
Full Name	Mrs Tamsyn Craig
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	<p>Do you have any comments on the sustainability of the proposal?</p> <p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents, including ourselves, already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10345
Person ID	1268418
Full Name	JOSEPHINE O'NEILL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Some concerns include</p> <p>Increased Flood Risk</p> <p>Again because Berhamsted is situated in a valley during heavy rain and storms the drainage infrastructure often cannot cope. I have seen the road outside my house on many occasions turn into a small river, the tarmac has been lifted and even main drains burst. Anything that reduces the ability of the land to drain and hold water at the top of the hills should be rejected. These sites are situated at valley tops and would lead to more water runoff effecting those lower down the hills.</p> <p>Air Quality</p>

The plan needs to provide a comprehensive analysis to ensure we have a plan which ensures the reduction of air pollution. Sites should discourage car use, encourage walking and any development should have net zero emissions.

Included files

Title Question: Sustainability Appraisal

ID EGS10362

Person ID 1268427

Full Name GRAHAM HAYNES

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I endorse the submission by 'Tring in Transition' regarding the inadequacy of the Council's Sustainability Appraisal, particularly with regard to the Tring area.

Included files

Title Question: Sustainability Appraisal

ID EGS10476

Person ID 1268450

Full Name JOSEPH STOPPS

Organisation Details DACORUM GREEN PARTY

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

<p>QUESTION: Sustainability Appraisal comment</p>	<p>Comment on Sustainability have been comprehensively addressed in previous comments.</p> <p>Biodiversity (SA Objective 1)</p> <p>We must achieve a genuine net gain in biodiversity. This can be achieved by rewilding and planting trees protected for future generations. We call for every 1 acre of green belt that is developed a further 2 acres are rewilded with public access. We call for Biodiversity and mandatory commitments to incorporate wildlife and wildlife corridors into every new development.</p> <p>Greenhouse gas emissions (SA Objective 4)</p> <p>This has been extensively covered in previous comments. We call for every new property to be net zero including Scope 3. It must be mandatory that every home is dual aspect and well insulated. Solar panels and heat pumps must be mandatory where it can be proved they will be efficient. The replanting of new woodland as suggested above could be used to offset carbon.</p> <p>Air Quality (SA Objective 5)</p> <p>Due to its topography air pollution in central Berkhamsted can be very poor. We must incorporate electrical vehicle charging points in every new home as a mandatory requirement to encourage electric vehicles along with solar energy to power them. We must invest in safe cycling routes and electric public transport. Tring has 2 electric charging points currently which is completely inadequate for its current population. Electric Vehicle charging points must be incorporated into existing Victorian housing stock in the towns to help mitigate any increase in air pollution by additional homes.</p>
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Included files	
Title	Question: Sustainability Appraisal
ID	EGS10501
Person ID	869129
Full Name	Ms Ann Hetherington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10561
Person ID	1268702
Full Name	Kirstin Chaplin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p>6/ Do you have any comments on the sustainability of the proposal?</p> <p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10574
Person ID	1164729
Full Name	David Clarke
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p>

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “East of Tring” fails to meet the efficient use of land objective and yet this isn’t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS10630

Person ID 1268732

Full Name KATRINA BECKWITH

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I consider that the overarching principles of the sustainability appraisal are in accordance with the Framework. It is noted however that the approach to assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “East of Tring” fails to meet the efficient use of land objective and yet this isn’t carried through into the results.

Included files

Title Question: Sustainability Appraisal

ID	EGS10649
Person ID	1268737
Full Name	CLIVE PORTER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>here is currently a large estate being built off Ickniel way, Tring. With this and the added pressure from extensive building in Pitstone the traffic along Ickniel Way during the 'rush hour' makes it difficult to turn onto the road from any junction in Tring. The noise of traffic has also increased.</p> <p>The addition of another 2730 houses will add at least that number of vehicles, possible more given the number of houses which now have two or more vehicles.</p> <p>The roads around Tring are not suited to this quantity of traffic. Ickniel Way, despite being the main route between Dunstable, Tring and Aylesbury is a residential street. Brook Street is a narrow road with vehicles parked along it's length restricting traffic flow. The A41 bypass may have the capability but vehicles in Tring still have to get to it.</p> <p>Although there is mention of improved public transport this is dependant on the private companies who would be supplying it.</p> <p>Improved pedestrian and cycle access</p> <p>The planned developement removes two farms at a time when we should be looking at producing more food for the population.</p> <p>I do not see how any of these planned developments can blend into the local, small town environment, or how building on 'green belt' will benefit the environment in general.</p>
Included files	
Title	Question: Sustainability Appraisal

ID	EGS10707
Person ID	1268746
Full Name	DANIEL GARROD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Berkhamsted has a congestion problem and does not have a sustainable transport system. The location of the BA1 development suggests these houses will be to cater for workers from London who will all use the train station and/or A41. There appears to be little in the plan addressing this extra burden on infrastructure particularly as regards public transport improvements.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10712
Person ID	1161079
Full Name	Melanie Llewellyn
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	DCB ignores the post-pandemic effects. It grossly underestimates windfall developments, it does not assess the use of brownfield sites or the in-filing that could easily take place in Hemel Hempstead where there are large areas pf unused mown grass (not environmentally beneficial – no meadow flowers etc.) and poorly maintained public open spaces that

are scarcely used. All of these could provide excellent affordable terraced housing without encroaching on the Green Belt and make proper use of existing transport and civic facilities.
 I endorse everything said here by CRPE and BRAG with the proviso that there should be much more infilling within Hemel Hempstead to balance the housing density in the various towns in the Borough.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS10747
Person ID	1145586
Full Name	Miss Hannah Moynehan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>As stated in the Sustainability Appraisal: <i>“any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects</i></p> <p><i>... relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants”</i></p> <p>Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure</p> <p>There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.</p> <p>Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land</p> <p>Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.</p>

SA states it has found 'no predicted effects' against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road, floods regularly (please see picture below taken in January 2021).

[PLEASE SEE ATTACHED IMAGE]

Photo of area for development taken by a local resident (no copyright)

The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites which do not encourage car use or increase congestion;
- the creation of a robust electric transport network;
- planning which ensures net zero emissions from new developments; and
- the creation of carbon fixation via rewilding and protection of natural

The SA and Plan sites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring, in terms of, design and site selection.

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types and sizes of home (a minimum of 35% to be affordable housing), however, affordable needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will be less pressure to build on the greenfield sites.

Included files	Photo.jpg
Title	Question: Sustainability Appraisal
ID	EGS10755
Person ID	1268754
Full Name	Mrs Rebecca Lumsdon

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Whilst accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, I have serious concerns regarding the sheer scale of proposed development.</p> <p>The Council has failed to take account of National Planning Policy Framework (NPPF), paragraph 11, footnote 6 which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>I also acknowledge that recent Government guidance on calculating housing need has been, at best, confusing. I firmly believe that housing needs should be based on the most recent and relevant data, which is currently the 2018 based Office for National Statistics (ONS) projections. The Council has based its calculations on the outdated 2014 based ONS data which, in my opinion, would result in a significant overestimate of housing and brings into question the soundness of any local plan based on them.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10771
Person ID	1268759
Full Name	Mrs Catherine Rudin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within

a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a widespread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required.

There is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS10784

Person ID 1268762

Full Name Mrs Natalie Hill

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape

independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “East of Tring” fails to meet the efficient use of land objective and yet this isn’t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS10794
Person ID	1268763
Full Name	Mr Michael Hill
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn’t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site’s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a

wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “East of Tring” fails to meet the efficient use of land objective and yet this isn’t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS10847

Person ID 1145633

Full Name Mrs Suzanne Nixon

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment See previous comments on Sustainable Development Strategy

There are far too many negatives in important areas and I would agree with these.

Included files

Title Question: Sustainability Appraisal

ID EGS10903

Person ID	1268814
Full Name	Ms Emma Cotton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Some concerns include</p> <p>Increased Flood Risk</p> <p>Again because Berhamsted is situated in a valley during heavy rain and storms the drainage infrastructure often cannot cope. I have seen the road outside my house on many occasions turn into a small river, the tarmac has been lifted and even main drains burst. Anything that reduces the ability of the land to drain and hold water at the top of the hills should be rejected. These sites are situated at valley tops and would lead to more water runoff effecting those lower down the hills.</p> <p>Air Quality</p> <p>The plan needs to provide a comprehensive analysis to ensure we have a plan which ensures the reduction of air pollution. Sites should discourage car use, encourage walking and any development should have net zero emissions. This should be absolutely paramount in developers minds with all the young people that live here and whose lives are beign affected.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10946
Person ID	1268880
Full Name	Ms Jo-anne Tunmer
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10977
Person ID	1268903
Full Name	ANGELA NODDER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	The development will put water supply under great pressure and is at risk of damaging the aquifer and the local environment
Included files	
Title	Question: Sustainability Appraisal
ID	EGS10989
Person ID	1162376
Full Name	Jade Holmes
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11012
Person ID	333882
Full Name	Mr Mark Barfield

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11034
Person ID	1268909
Full Name	Dr Leslie Kennedy
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	The sustainability Appraisals have enough local knowledge
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11045
Person ID	1145445
Full Name	Mr Jason McInerney
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p>

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “East of Tring” fails to meet the efficient use of land objective and yet this isn’t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS11064

Person ID 1268913

Full Name SONIA FAIRBARN

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment Tring in Transition comments have clearly highlighted the inadequacy of the Council's Sustainability Appraisal, especially in relation to the proposals in the Tring area. Impacts on the environment (SAC, SSSI's etc), transport issues, flooding, etc are not adequately appraised.

The Sustainability Appraisal needs to be completed prior to the completion of the Local Plan. Without this there can be no accurate conclusion as to whether the proposals are sustainable and comply with legislation and the councils own policies on sustainability and protecting the environment. The levels of the proposed growth are highly likely to result in the need for mitigation measures that require NEG. Safeguarding the existing high levels of biodiversity interest is not the same as providing NEG.

Sustainable growth for a small market town is incompatible with the draft plans excessive growth proposals.

Included files

Title Question: Sustainability Appraisal

ID EGS11095

Person ID 1258923

Full Name Arthur Barfield

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

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Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title	Question: Sustainability Appraisal
ID	EGS11113
Person ID	1268939
Full Name	Ms Sylvia O'Brien
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>

Included files	
Title	Question: Sustainability Appraisal
ID	EGS11133
Person ID	211222
Full Name	Mr Adrian Howe
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>The current health and social care provision in Dacorum is barely coping and with an increase in population of 25% will undoubtedly begin to fail.</p> <p>Other elements of infrastructure will also be placed under severe stress. The water supply is already stretched and a 25% increase in demand will harm the local environment. The waste water system is inadequate in places, Potten End being a prime example.</p> <p>The development of the Digital Technologies should not just focus on the new estates but be district wide.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11185
Person ID	1264551
Full Name	Mark Somervail
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>SA1 biodiversity - the ancient hedgerows on Bell Lane and Darrs Lane (BK06) and the Lockfield site (Bk07) are important habitats in themselves and they also form important wildlife corridors between Northchurch Common, the canal area and the Chilterns AONB. This will have a serious impact on biodiversity.</p> <p>Water runoff from these developments will drain into the River Bulbourne and damage the fragile ecosystem of this rare chalk stream.</p> <p>SA2 water resources - increased abstraction to supply the new developments will further impact the River Bulbourne which is already dry in many summers due to excessive abstraction.</p> <p>SA3 flooding - the Lockfield site Bk07 is a potential risk for flooding in itself. Building on all the new areas of Bk06 & Bk07 will increase the water runoff and increase the risk of low lying areas of Northchurch. Darrs Lane is already a river during heavy rain. The gullies get blocked quickly in any rain storm and water accumulates at the end of Granville Road and at the bottom of Darrs Lane.</p> <p>SA5 Air Quality - there is already a pollution hotspot on Northchurch High Street between New Road and Darrs Lane. The increased traffic from the new developments will lead to more standing traffic and worse pollution which will affect residents and the children in the nearby school.</p> <p>SA8 Historic environment. The large developments within and around Northchurch will irreversibly affect the historic character of Northchurch which pre-existed Berkhamsted.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11193
Person ID	1268980
Full Name	Ian and Pamela Gamble
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	<p>Water</p> <p>We believe that the south-east of England has potential problems with its water supplies most of which comes from aquifers. We are probably putting the whole population at risk without securing other water sources.</p> <p>Air Quality</p> <p>Having many more people living in this area will also adversely affect air quality which is borderline in many parts of the town.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11200
Person ID	1268982
Full Name	Mr Andrew Yeomans
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I support the submissions of the Chiltern Countryside Group (CCG) and the Grove Fields Residents Association (GFRA) on this question.</p> <p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard to the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet</p>

this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Insufficient weight and assessment has been given by the LP to those impacts and obligations. The LP Interim Sustainability Appraisal (non-technical summary) provides assessment criteria and then assesses these against options A-E if developed.

I do not accept the assessments for options A, C-E as accurately reflecting the true impact on (a) landscape (b) historic environment and (c) sustainable locations. I do not accept that developments of the Green Belt sites in Tring and Berkhamsted which are included in those options would be 'unsustainable' with only 'minor adverse impacts on the SA objectives'.

The Green Belt sites located in Tring and Berkhamsted identified in the LP would suffer the highest level of adverse impact and should therefore be assessed as 'very unsustainable' with 'significant adverse impacts on the SA objectives'.

I question whether the consultants employed for the Sustainability Assessment have actually visited these sites, or indeed whether Councillors representing areas other than Tring or Berkhamsted have done so. These are large swathes of significant green, tranquil and natural landscape, which informs the setting of the Chilterns AONB, a local and national high quality public asset, which any development of those sites would permanently destroy.

I do not accept the statement that for these sites: 'new large greenfield developments could provide opportunities for biodiversity enhancements and make use of district heating systems'. The sites in question already have significant biodiversity which we believe would be challenging to 'enhance'.

Included files

Title Question: Sustainability Appraisal

ID EGS11228

Person ID

Full Name

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes

* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11249
Person ID	1268990
Full Name	Mr Nick de la Bedoyere
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as East of Tring fails to meet the efficient use of land objective and yet this isn t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11250
Person ID	1262469
Full Name	Mark Waters
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

QUESTION: Sustainability Appraisal comment	There is already considerable congestion in Tring and Berkhamsted and on the A41. Also on many days there are insufficient parking spaces at Tring Station. In the short to medium term I believe cars and buses will continue to be the primary source of transport and innovative alternative solutions which do not involve cars ,trains, or buses are unlikely to resolve the the problem.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11264
Person ID	1268893
Full Name	Mr Martin Hopping
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site' s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as " East of Tring" fails to meet the efficient use of land objective and yet this isn' t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion</p>

into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS11276

Person ID 221884

Full Name Ms Eliza Hermann

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment The Sustainability Appraisal fails to recognise that the most positive impact on the environment and climate would be not to overdevelop the borough. If implemented, the proposed Local Plan will over-provide housing and employment space based on the flawed algorithm and out-dated data the Council is using to determine need. Not developing the 850 hectares of green space which are identified in this proposed Plan, and instead leaving this land for nature, wildlife, recreation and carbon sequestration, is the best and most sustainable approach the Council could take.

Included files

Title Question: Sustainability Appraisal

ID EGS11292

Person ID 1268994

Full Name Mrs Julie Hopping

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as " East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11323
Person ID	1269000
Full Name	Mrs Tracey Franklin
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>A few of my main concerns are:</p> <p>Air quality</p> <p>As stated above in other comments, the impact this unrequired level of development will have on air quality in the town, due to the vastly increased use of additional personal vehicles and how this will impact the health of myself and especially my children, greatly concerns me.</p> <p>It has been proven that this level of development is not based on current requirements and as such, a town this size can NOT maintain the same level of mental and physical health it currently affords, due to the vast proposed overpopulation of the town.</p> <p>Increased Flood Risk</p> <p>Put simply, you keep developing the town, it will not be able to cope with the increased demand on the drainage system, which in turn will increase flooding and the requirement for constant spend by the Council to maintain damaged drains and roads. Having lived in the town for over 17 years, I have seen the flooding of the drains and subsequent properties, increase dramatically in that time.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11334
Person ID	1269004
Full Name	Mr Kevin Coleman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p>It will be noted from the above that in presenting the positive aspects of the Duckhall Farm scheme, we have touched in part on flaws within the Evidence Base. In this regard, we would draw particular attention to the following:</p> <ul style="list-style-type: none"> Sustainability Appraisal – When looking at the comparison of the different site options for Bovingdon at Table 5-8 on page 39 of the SA Report, it is evident that Duckhall Farm scores more highly than Grange Farm, even on the analysis presented. However, the SA analysis contains inaccuracies, not least in that it scores Duckhall Farm and Grange Farm equally in terms of accessibility by walking and cycling (as discussed above it is evident that in terms of ability to walk safely to shops and services, the Duckhall site is far superior), and because in respect of community cohesion, the Grange Farm site is credited because of the suggested delivery of the school site (when as we have identified this is not required or deliverable), whilst the Duckhall site is unreasonably marked with a negative score because it is suggested that somehow its location with the grounds of the prison to the north could cause anxiety – not only is this wholly inconsistent with the allocation of The Mount, but there is no evidence whatsoever to back up this unusual hypothesis, it is pure and unjustified. Therefore when read properly and when properly understood, it is clear that the Sustainability Appraisal supports Duckhall Farm over the alternatives, not Grange Farm;
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11356
Person ID	221830
Full Name	Mrs Baerbel de la Bedoyere
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard to the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has</p>

brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected

under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS11453

Person ID 1264362

Full Name Juliet Miller

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment As stated in the Sustainability Appraisal: *"any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects*

... relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants"

Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure

There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.

Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land.

Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.

SA states it has found 'no predicted effects' against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road, floods regularly (please see picture below taken in January 2021).

Photo of area for development taken by a local resident (no copyright)

The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites which do not encourage car use or increase congestion;
- the creation of a robust electric transport network;
- planning which ensures net zero emissions from new developments; and
- the creation of carbon fixation via rewilding and protection of natural

The SA and Plan sites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring, in terms of, design and site selection.

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types and sizes of home (a minimum of 35% to be affordable housing), however, affordable needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will be less pressure to build on the greenfield sites.

Title	Question: Sustainability Appraisal
ID	EGS11462
Person ID	1261429
Full Name	Douglas Fisher
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	This comment refers to the Sustainability Appraisal carried out for the Dunsley Farm site. See the final point in the comments under Question 5
Included files	

Title	Question: Sustainability Appraisal
ID	EGS11498
Person ID	865014
Full Name	Mr Robert Turnbull
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with

regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as East of Tring fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS11506
Person ID	1269116
Full Name	Mr & Mrs S & J Ballantyne
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

QUESTION: Sustainability Appraisal comment	It would not appear to be fit for purpose as it fails to understand the irreversible harm that, in particular the land east of Tring, would be caused to making the efficient use of land - contribution to Green Belt openness etc., as before, and efficient use of high grade agricultural land. Why didn't that aspect of sustainability affect the allocation of these sites?
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11517
Person ID	1269117
Full Name	ANITA PARRY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this</p>

space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS11554

Person ID 1269122

Full Name KATHRYN WHITTLE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with

regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites

being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined

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agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS11565

Person ID 1269123

Full Name KENTON WHITTLE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS11633

Person ID 1158198

Full Name JACK ARMSTRONG

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment The scoring system doesn't take into account the full impact and the land "East of Tring" is too ambiguous.

Included files

Title Question: Sustainability Appraisal

ID EGS11642

Person ID 1269148

Full Name SIMON AND ANNA BARNARD

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	The Plan is clearly not sustainable. The majority of development is located on the fringes of the main towns some considerable distance from town centres, transport hubs and community facilities. Only 23% of housing development is proposed on brownfield sites - hardly a sustainable approach. Given the changes in peoples' working and shopping habits, the Council has failed to take into account the number of empty premises that can be used for housing. A major new road is proposed to the north of Hemel Hempstead which is an indication of out-dated thinking relying on the car. Little is made of promoting public transport and although walking and cycling is mentioned this is impractical given that some of the major sites around Hemel Hempstead and Berkhamsted are on the valley ridges. Considerable loss of the Green Belt and open land will certainly not make a positive contribution to the fight against climate change.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11653
Person ID	1269150
Full Name	Mrs Helena Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	The local plan does not take into consideration the impact these numerous developments on the communities of Hemel Hempstead, Berkhamsted & Tring and the surrounding environment. The removal of green belt land and the building of houses on such a large scale will increase the flood risk in these towns, reduce the air quality and remove green spaces currently enjoyed by residents of these towns.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11665

Person ID	1269152
Full Name	SIMON RHEAD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal

ID	EGS11692
Person ID	1269212
Full Name	PETER SCOTT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>As stated in the Sustainability Appraisal: <i>“any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects ... relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants”</i></p> <p>Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure</p> <p>There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.</p> <p>Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land.</p> <p>Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.</p> <p>Flood Risk (SA Objective 3)</p> <p>SA states it has found ‘no predicted effects’ against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road, floods regularly (please see picture below taken in January 2021).</p>

The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites which do not encourage car use or increase congestion;
- the creation of a robust electric transport network;
- planning which ensures net zero emissions from new developments; and
- the creation of carbon fixation via rewilding and protection of natural habitats

The SA and Plan sites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring, in terms of, design and site selection.

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types and sizes of home (a minimum of 35% to be affordable housing), however, affordable needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will be less pressure to build on the greenfield sites.

Included files

[PETER SCOTT 3.jpg](#)

Title

Question: Sustainability Appraisal

ID

EGS11714

Person ID

1269217

Full Name

Mr David Hulse

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11739
Person ID	1269230
Full Name	CHARLES GABRIEL

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>I strongly object to the Dacorum Local Plan which proposes 16,600 new homes to be built mainly on 850 hectares of green belt around Tring, Berkhamsted and Hemel Hempstead in the next 18 years.</p> <p>This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit will no doubt continue to decrease this projection.</p> <p>In this plan, thousands of new homes are simply bolted onto the perimeters of our existing towns over green belt land with inadequate thought to the pressures on water supplies, traffic needs, medical facilities, education, recreation, recycling centres and employment needs (to name but a few crucial infrastructure requirements) and the detrimental impacts on our wildlife and countryside that will extend far beyond just the green belt land being concreted over.</p> <p>The proposed plan has clearly prioritised house building growth over considerations for the climate emergency, and the health and well being of the existing residents and infrastructure.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11741
Person ID	1269230
Full Name	CHARLES GABRIEL
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <p>1 To protect, maintain and enhance biodiversity and geodiversity at all</p> <p>Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000 + more people and their cats and dogs into them, can not be done without damaging biodiversity.</p> <p>1 To protect, maintain and enhance water resources (including water quality and quantity)</p> <p>DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.</p> <p>Development at the level proposed is simply not compatible with these 2 objectives.</p> <p>With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11745
Person ID	1269230
Full Name	CHARLES GABRIEL
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	As outlined in my replies to Question 1 and 2 development on the scale proposed is neither sustainable nor necessary.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11756
Person ID	1269233
Full Name	CIARA KENT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected</p>

under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.
 Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS11777

Person ID 871625

Full Name Mrs Clare Francis

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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 Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS11788

Person ID 1264468

Full Name Melanie Parr

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment

I strongly object to the Dacorum Local Plan which proposes 16,600 new homes to be built mainly on 850 hectares of green belt around Tring, Berkhamsted and Hemel Hempstead in the next 18 years.

This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit will no doubt continue to decrease this projection.

In this plan, thousands of new homes are simply bolted onto the perimeters of our existing towns over green belt land with inadequate thought to the pressures on water supplies, traffic needs, medical facilities, education, recreation, recycling centres and employment needs (to name but a few crucial infrastructure requirements) and the detrimental impacts on our wildlife and countryside that will extend far beyond just the green belt land being concreted over.

The proposed plan has clearly prioritised house building growth over considerations for the climate emergency, and the health and well being of the existing residents and infrastructure.

Included files

Title Question: Sustainability Appraisal

ID EGS11790

Person ID 1264468

Full Name Melanie Parr

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment The Sustainability Appraisal report lists the first 2 key objectives as follows:-

1 To protect, maintain and enhance biodiversity and geodiversity at all

Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000 + more people and their cats and dogs into them, can not be done without damaging biodiversity.

1 To protect, maintain and enhance water resources (including water quality and quantity)

DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.

Development at the level proposed is simply not compatible with these 2 objectives.

With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.

Included files

Title Question: Sustainability Appraisal

ID EGS11792

Person ID 1264468

Full Name Melanie Parr

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment As outlined in my replies to Question 1 and 2 development on the scale proposed is neither sustainable nor necessary.

Included files

Title Question: Sustainability Appraisal

ID EGS11829

Person ID 350823

Full Name Mrs Sue Yeomans

Organisation Details Chairman
Chilterns Countryside Group

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No	
QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal is not fit for purpose. It identifies sites T02 and T03 as being high quality agricultural land but then assesses the effect of removing them from Green Belt to build 'a new neighbourhood' with nearly 2000 homes, shops, schools, roads etc... as having 'only minor adverse impacts'.</p> <p>I fully support the response of the Chiltern Countryside Group to this question.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS11917
Person ID	1268937
Full Name	Mrs Lynette Hyde
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>Q 6 Sustainability Appraisal</p> <p>The enormity of the proposals will put pressure on the water supply.</p> <p>The Chilterns chalk streams are very fragile and any additional need to pump water will have disastrous effects on the Gade and Bulbourne</p> <p>The increase in traffic such development will bring will put unsustainable pressure on the roads and transport system.</p> <p>The new road from the M1 to the Leighton Buzzard road will have unforeseen detrimental consequences.</p> <p>Where are all these people going to go to the Dr, Dentist, we do not have a Hospital fit for purpose within Dacorum – this proposal will be a health and welfare disaster.</p> <p>Where will the children go to school – I can only see plans for 5 'potential' new schools to accommodate a potential 34,000 children (2.4 children per household).</p> <p>Bio-diversity – loss of habitat and recreational green space by over development.</p>

The NT Estate at Ashridge is listed as an amenity green space by DBC and both South Beds and Aylesbury Bucks CC it cannot cope with the additional footfall during the pandemic, additional use will destroy the fragile bio diversity.

Climate Change – providing 17,000 new homes and 120,000 sqm of industrial floors pace will result in unsustainable greenhouse gas emissions.

Air Quality The increased traffic by these developments is unacceptable detrimental effect on air quality.

Insufficient attention to protection from environmental pollution.

Waste disposal – where is it all going to go? Insufficient consideration.

Included files

Title Question: Sustainability Appraisal

ID EGS11976

Person ID 1264526

Full Name Peter King

Organisation Details Water End & Upper Gade Valley Conservation Society

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment

- **Water Supply**

Much of the water supply for the Hemel Hempstead area comes from the aquifers underneath the Upper Gade Valley. There is recent evidence (see below) that these are being over extracted now. Therefore, the likelihood that they would be able to sustain the demands of the development highlighted in the Plan is remote. The impact on the River Gade during dry periods would mean it is very likely to dry up with the obvious devastating effect on the wildlife that exists around it. It did dry up some 20 years ago as a result of over extraction. We are aware of a well in Gaddesden Lane which is monitored by the water authorities on a regular basis, measuring both depth and water quality. As no water is pumped for domestic or commercial consumption, the depth of water truly represents the level of the water table. It has been noted for some time this level has been getting lower every year.

Included files

Title Question: Sustainability Appraisal

ID	EGS12011
Person ID	1269353
Full Name	TESSA BARFIELD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12061

Person ID	1264202
Full Name	Philippa Wosiek
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	85% of Dacorum is rural with 60% being Green Belt. We should not allow the impact of further building works on an environment that has given so much to so many over the last year. The impact on the Chilterns AONB would cause distress to both human and animals let alone the stress to the important Chilterns Beechwoods. The plan for improvement does not seem to take into account what we have which should be properly maintained. Why create a bigger problem in the name of future development?
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12079
Person ID	1269372
Full Name	MATTHEW SPEED
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape

independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Included files	
Title	Question: Sustainability Appraisal
ID	EGS12092
Person ID	1269386
Full Name	KERR LINDA
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Environment

The proposed spec of the intended housing is not specified. Any new builds should have solar panels as a basic requirement and run on renewably generated heat.

With the advent of electric cars, there should be provision for charging at all properties and more readily available around the town.

Included files

Title Question: Sustainability Appraisal

ID EGS12108

Person ID 1145854

Full Name Mrs Deborah Doughty

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION: Sustainability Appraisal comment

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Equally, building in the centre of town (Tr06) would cause irreversible damage to a historic town.

Included files

Title Question: Sustainability Appraisal

ID EGS12152

Person ID 1160677

Full Name Mr Paul Doughty

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment

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Included files

Title Question: Sustainability Appraisal

ID EGS12169

Person ID 1269444

Full Name Mr & Ms Jim & Katie Barnard & Partridge

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment

Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS12189
Person ID	399285
Full Name	Mr John Roberts
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	The impact on the local environment, ecology and the existing social community will all have negative impacts.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12202
Person ID	1145481
Full Name	Mr Brian Kazer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	Table 4-1: Key sustainability Issues and Opportunities (Page 16)

The report identifies a “key sustainability issue” as : “Ashridge SAC/SSSI, Tring Park, Tring Reservoirs and the Grand Union Canal are all reported to be experiencing visitor pressures. As the urban population increases, pressures on access to the countryside and these key attractions will increase.”

Although Ashridge is mentioned in the Local Plan, none of the other areas get mentioned at all, nor does College Lake, also on the edge of Tring. These are serious omissions. With proposed 55% increase in size of Tring (which equates to roughly 5,000 more cars) there will be huge pressure on all these sites, with “guerrilla parking” on public roads (often in dangerous places) and on verges. It is essential that this is properly addressed with mitigations within the Plan.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS12224
Person ID	1269476
Full Name	EMILY DAVIES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <p>1 To protect, maintain and enhance biodiversity and geodiversity at all</p> <p>Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000 + more people and their cats and dogs into them, can not be done without damaging biodiversity.</p> <p>1 To protect, maintain and enhance water resources (including water quality and quantity)</p>

DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.

Development at the level proposed is simply not compatible with these 2 objectives.

With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.

Included files

Title Question: Sustainability Appraisal

ID EGS12246

Person ID 1269479

Full Name BARBARA HARVEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

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regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical

landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Included files

Title Question: Sustainability Appraisal

ID EGS12262

Person ID 1227654

Full Name Mrs Margaret Warman

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment SA Objective 9 - To conserve and enhance landscape and townscape character and encourage local distinctiveness - certainly does not apply to your proposals for Tring. Quite the opposite.

3.3 Why was Option Dii not chosen? Bovingdon Airfield must be a more sensible option than Tring AONB.

Included files

Title Question: Sustainability Appraisal

ID EGS12268

Person ID	1264925
Full Name	sharon warner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <p>1 To protect, maintain and enhance biodiversity and geodiversity at all levels.</p> <p>Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000+ more people and their cats and dogs into them, can not be done without damaging biodiversity.</p> <p>1 To protect, maintain and enhance water resources (including water quality and quantity)</p> <p>DBC's own assessment states that the Gade valley, a Nationally/Globally and very important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.</p> <p>Development at the level proposed is simply not compatible with these 2 objectives.</p> <p>With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12271

Person ID	1264925
Full Name	sharon warner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	My replies to Question 1 and 2 development on the scale proposed is neither sustainable nor necessary.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12289
Person ID	1269485
Full Name	NICOLA HULSE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would

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Included files

Title Question: Sustainability Appraisal

ID EGS12303

Person ID 1269488

Full Name SAMANTHA SMITH

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment Builising on Greebelt Land is NOT sustainable

Included files

Title Question: Sustainability Appraisal

ID EGS12332

Person ID	1264637
Full Name	Ollie Parrish
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal

ID	EGS12355
Person ID	1269489
Full Name	STEVE HILL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	The Berkhamsted Residents Action Group (BRAG) has responded in full to the consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12366
Person ID	1269491
Full Name	Mr David Eeley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape

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Included files

Title Question: Sustainability Appraisal

ID EGS12372

Person ID 1269492

Full Name Mrs Isabelle Gorton

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn’ t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site’ s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a

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Included files

Title Question: Sustainability Appraisal

ID EGS12404

Person ID 1269497

Full Name MICHAEL RUDIN

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn’t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site’s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a

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Included files

Title Question: Sustainability Appraisal

ID EGS12421

Person ID 1269503

Full Name Mr Jan Wosiek

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment Just a general comment in that bearing in mind, the Government's method of calculating housing need has been discredited, the number of dwellings required within Dacorum should reduce, hence some sections within this document need re-writing for accuracy.

Included files

Title Question: Sustainability Appraisal

ID	EGS12446
Person ID	1146040
Full Name	Mrs Rachel Macdonald
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>As stated in the Sustainability Appraisal: <i>“any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects ... relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants”</i></p> <p>Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure</p> <p>There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.</p> <p>Biodiversity (SA Objective 1)</p> <p>Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land.</p> <p>Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.</p> <p>Flood Risk (SA Objective 3)</p> <p>SA states it has found ‘no predicted effects’ against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road, floods regularly (please see picture below taken in January 2021). [SEE ATTACHED PHOTO OF DEVELOPMENT AREA] <i>Photo of area for development taken by a local resident (no copyright)</i></p>

Greenhouse gas emissions (SA Objective 4)

The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

Air Quality (SA Objective 5)

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites which do not encourage car use or increase congestion;
- the creation of a robust electric transport network;
- planning which ensures net zero emissions from new developments; and
- the creation of carbon fixation via rewilding and protection of natural habitats

Landscape & Townscape (SA Objective 9)

The SA and Plan sites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring, in terms of, design and site selection.

Housing (SA Objective 13)

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types and sizes of home (a minimum of 35% to be affordable housing), however, affordable needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will be less pressure to build on the greenfield sites.

Included files	Photo.jpg
Title	Question: Sustainability Appraisal
ID	EGS12495
Person ID	1269524
Full Name	DAVID ATKINSON

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Of course any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants”</p> <p>Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure</p> <p>There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12500
Person ID	1269525
Full Name	QUENTIN HALFYARD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	As outlined in my replies to Question 1 and 2 development on the scale proposed is neither sustainable nor necessary.
Included files	

Title	Question: Sustainability Appraisal
ID	EGS12512
Person ID	1269527
Full Name	JULIAN SMITH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>

Included files	
Title	Question: Sustainability Appraisal
ID	EGS12596
Person ID	1269561
Full Name	Mr & Mrs Martin & Tracey Martin & Tracey Read
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12606
Person ID	1269554
Full Name	Ellen Satchwell
Organisation Details	Sustainable Development Lead Advisor - Thames Solent Team Natural England

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	Sites of Least Environmental Value In accordance with the paragraph 171 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12688
Person ID	1269544
Full Name	Ms Lindy Foster Weinreb
Organisation Details	Chairman Berkhamstead Citizens Association
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	Water availability Appendix C17 The comment reflects the concerns residents have about the aquifer and abstraction, set out in stark terms: Landscape C27 While the term ‘irreversible’ is explicitly recognised for this Option [large scale release of Green Belt], this and the adverse impact on AONB is only implied where loss of Green Belt is proposed for other Sites.

The bus route 500 operates as a commercial service by Arriva at a frequency of 3 buses per hour on Monday-Friday, 2 buses per hour on Saturdays and 1 bus per hour on Sunday shopping hours. There is no evening service or early service on Saturdays. Due to its length, it also suffers from reliability issues. Despite fulfilling the criteria of a “good public transport service” in the Topic papers, there is a paucity of services in other directions from Berkhamsted. We do not agree that a sustainable transport network is in place in Berkhamsted.

The following abstracts from the site assessments show a common theme –

- the distance from the town centre,
- the gradient serving to discourage walking or cycling,
- absence of alternative public

Also their proximity to the A41 - its ambient and peak noise levels may have an adverse effect on Health and Wellbeing to residents unless effective mitigation measures are adopted.

The Attachment with this reply suggests that transport routes should be defined from the outset to encourage residents to use public transport in preference to private vehicles.

Page E38

E44

E46

Included files

Title Question: Sustainability Appraisal

ID EGS12697

Person ID 1269597

Full Name Ms STEPHANIE HOWE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment What about healthcare? There doesn't seem to be provision for this. Also the utilities, especially the water supplies and sewage systems.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS12726
Person ID	1269605
Full Name	Ms Hailey Woldt
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	The plan does not sufficiently implement sustainability because it will lead to over-extraction of water from our ecologically-rare chalk streams, the planned housing is not carbon neutral and the road infrastructure does not have the capacity to accommodate so many additional car-dependent households.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12784
Person ID	1269628
Full Name	Steven Bragg
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within

a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would

clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS12792

Person ID 1269630

Full Name Christopher Lyne

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment	<p>Having read the Sustainability Appraisal, it seems, surprisingly, that it is in fact absolutely necessary to state the obvious. Dacorum declared a Climate Emergency in July 2019. All new buildings need to be carbon neutral by 2025. The proposed housing figures (see above) will make this target completely unachievable. The proposed loss of green belt land will reduce mitigating carbon dioxide capture. It is hard to comprehend how the Borough can declare a Climate Emergency and then propose a Plan that can only make matters much worse.</p> <p>Our chalk streams are something to treasure providing unique and irreplaceable ecosystems. They are already in trouble – the River Gade ran dry in 2019. The 28% more water that will be required for the extra population anticipated by the Plan will have to come from somewhere and where is not clear in the Plan.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12821
Person ID	1269634
Full Name	Frank Worth
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12848

Person ID	1145801
Full Name	Mr Guy Barlow
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Some concerns include Increased Flood Risk</p> <p>Again because Berkhamsted is situated in a valley during heavy rain and storms the drainage infrastructure often cannot cope. I have seen the road outside my house on many occasions turn into a small river, the tarmac has been lifted and even main drains burst. Anything that reduces the ability of the land to drain and hold water at the top of the hills should be rejected. These sites are situated at valley tops and would lead to more water runoff effecting those lower down the hills.</p> <p>Air Quality</p> <p>The plan needs to provide a comprehensive analysis to ensure we have a plan which ensures the reduction of air pollution. Sites should discourage car use, encourage walking and any development should have net zero emissions.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12899
Person ID	1269665
Full Name	Mr Martin Hicks
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	Yes

* No

QUESTION: Sustainability Appraisal comment

Table 4-1: Key sustainability Issues and Opportunities

Biodiversity, including flora and fauna, and Geodiversity. This is a laudable reflection of some issues; however, it identifies conflicts and issues where the natural environment will be compromised by development - directly or indirectly. This includes the declining rural infrastructure of farming which is recognised within the plan as influencing the majority of the countryside itself. It also avoids providing examples of direct loss of sites.

Similar issues are recognised in respect of landscape – loss of traditional farming practices including livestock grazing, climate change, light pollution and loss of tranquillity.

Biodiversity is incompatible with the proposed growth (Fig 4-1. It is uncertain for landscape – which is clearly wrong, as the direct urbanisation of currently large and visible rural landscapes around Hemel and Tring in particular are not compatible with their maintenance. It therefore lacks the integrity to present a wholly reliable view of the plan’s ecological sustainability. In these respects, the appraisal demonstrates the failure of the plan to achieve sustainable development, in contrast to its views that the Compatibility Matrix indicates the Local Plan Strategic Objectives are compatible with the SA/SEA objectives. They are clearly not for key areas.

No sites in Hemel are recognised as having a negative impact on biodiversity in Table 5-6. Dunsley Farm is not recognised as having a damaging impact on biodiversity in Table 5-6. Indeed, no significant effects are identified in respect of the SA objective to protect, maintain and enhance biodiversity and geodiversity at all levels. Given the acknowledged impacts of pressure resulting from growth, and the direct and indirect impacts on sites, these assessments are clearly wrong and wholly unreliable. The same applies to conserve and enhance landscape character.

The same inconsistencies are reflected in Table 6-1 in respect of the delivery strategies. Whilst policies themselves for biodiversity are recognised as positive, this misses the actual impact development will have on the environment for which little or no constructive measures are proposed or if so, are inconsistent and wholly aspirational, such as SANGS.

The conflicts between policies and site impacts are not recognised; ‘uncertain effects’ are not at all uncertain and so have not been adequately considered. They conflict with later views on the need for SANGS to prevent pressure on the SAC and other SSSIs (6.7). Consequently, I do not consider the findings to be reliable without further work to demonstrate otherwise. Similar comments can be made to landscape, which whilst limited to certain areas, will have a major and significant damaging impact where development is proposed, affecting the setting of the new town and two supposed Market Towns. This hardly achieves a Garden City vision. Reliance on protecting the AONB is insufficient to achieve a sustainable approach, or recognition of the extent noise pollution can affect wildlife is irrelevant when sites are being

lost, damaged and the means to manage them declining. An HRA is being prepared and may highlight some of these issues further.

Whilst it states the Local Plan includes a series of policies aimed at protecting and enhancing the environment and public realm and helping towards achievement of associated Local Plan objectives, more work is needed to address the damaging impacts of the plan before it should be considered as delivering sustainable development.

Included files

Title Question: Sustainability Appraisal

ID EGS12911

Person ID 1207443

Full Name Mrs Jennifer Bissmire

Organisation Details Clerk
Markyate Parish Council

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment Markyate Parish Council appreciates that the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are required by law and are prepared by independent consultants TRL Ltd, appointed by DBC. It may be a common practice, but the colour codings used and the comparisons drawn are not easy reading, but throughout the studies, London Road, Markyate site is ranked as ‘Very unsustainable .. likely to have significant adverse impacts’ in reducing flood risk.

The Sustainability reports take a broad view of the policies and these are largely devoted to Hemel Hempstead.

Ref 5.5.2 page 45

When considering Markyate, the Sustainability Appraisal correctly records that the allocation of the site South of London Road will

‘ have a potential significant negative effect on objective SA3 –Flood Risk. An alternative site - land at Cotton Spring Farm would require access from South of London Road, and thus requiring the same bridge over the River Ver. In considering the outcomes of the appraisal of South of London Road, the Council has had regard to positive effects

identified against seven of the objectives, and believe that these benefits that the allocation will bring, outweigh the negatives'

The Parish Council assume that the land at Cotton Spring Farm is the land behind Peggys Field, which had previously been proposed by developers.

The Parish Council accepts that the Sustainability Appraisal had looked carefully at the London Road site.

Ref Appendix D Ref SP28

Ref Appendix E6

The detailed studies in the appendices also pick up that effect on water quality and quantity from developing the site Mk01, off London Road is uncertain due to the proximity of the site to the River Ver and the potential for adverse effects from run-off.

With regard to all Markyate sites, the Strategic Appraisal appendices find that the village is poorly served by public transport which could result in increased car use for accessing facilities and services outside of the village, and that the proximity to the A5183 which may be a source of noise pollution. The Parish Council would also add air pollution.

With the two central sites the appendices also note that the development of this site would result in the loss of a small existing employment area.

Overall, Markyate Parish Council accept that the Sustainability Reports have done a thorough job.

Included files

Title Question: Sustainability Appraisal

ID EGS12918

Person ID 1269666

Full Name Mr Andrew Oliver

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment Many of the sites for developments are in the valleys of our area's rare chalk streams, and there is no detail given on how these rare and important natural habitats will be protected.

The plan gives no detail on how car useage increase will be avoided, or how the existing roads will cope with the increased volume of traffic.

Included files

Title Question: Sustainability Appraisal

ID EGS12930

Person ID 1269677

Full Name CAROLINE CLIST

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment Whilst more than 60% of Dacorum is green belt, and there are other rural areas, there is no reference to how that land is going to be used to support local employment and sustainability objectives.

This is not land that is waiting to be built on. Mostly this is producing land providing employment in agriculture and leisure. There could be much more on the role of the rural areas to support sustainability objectives that could also help recognition that this is mostly land in productive use, providing food, employment and leisure opportunities. Once lost it is hard to recover. If there are more people, there is a greater need for clean water and food that rural areas provide.

We will run out of these resources, if we get things wrong in the near future. They could be identified, and real strategies developed to support the increase of biodiversity and carbon neutral food production for example.

Included files

Title Question: Sustainability Appraisal

ID EGS12943

Person ID 1269678

Full Name GARY TRENT

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	It is flawed based on earlier comments. I was only made a ware of this consultation late today so to go through detail is unrealistic. Every household should have been notified of the consultation. Residents can't respond to something we don't get notified is happening! Given the implications of this plan, the Councils approach to the consultation is unreasonable.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS12977
Person ID	1264971
Full Name	Louise Watson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Water – building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Surface run-off from all the new hard surfaces will also affect the nature of the stream.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p>

These issues will all impact on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, this plan is unsustainable.

Included files

Title Question: Sustainability Appraisal

ID EGS13000

Person ID 1059698

Full Name Mr Richard Lyne

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment Having read the Sustainability Appraisal, it seems, surprisingly, that it is in fact absolutely necessary to state the obvious. Dacorum declared a Climate Emergency in July 2019. All new buildings need to be carbon neutral by 2025. The proposed housing figures (see above) will make this target completely unachievable. The proposed loss of green belt land will reduce mitigating carbon dioxide capture. It is hard to comprehend how the Borough can declare a Climate Emergency and then propose a Plan that can only make matters much worse.

Our chalk streams are something to treasure providing unique and irreplaceable ecosystems. They are already in trouble – the River Gade ran dry in 2019. The 28% more water that will be required for the extra population anticipated by the Plan will have to come from somewhere and where is not clear in the Plan.

Included files

Title Question: Sustainability Appraisal

ID EGS13009

Person ID 330928

Full Name Mr James Gregory

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Where are they? The ill defined proposals are not helpful. Where are the applicable Health, infrastructure, employment, education, amenity supply, services, environmental impact, life support , climate (incl. clean air) and zero carbon proposals clearly defined and examples provided?
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13021
Person ID	1164731
Full Name	Deborah Turnbull
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “East of Tring” fails to meet the efficient use of land objective and yet this isn’t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS13036

Person ID 1270011

Full Name Mrs Nicola Davis

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I am concerned about the increase in flood risk, the increase in traffic and the resulting reduction in air quality.

The road quality locally is already very poor. People will use smaller residential roads to 'cut through', thereby raising safety concerns for our vulnerable, and not -vulnerable pedestrians.

Included files

Title Question: Sustainability Appraisal

ID EGS13059

Person ID	1270013
Full Name	Mr Daniel Ritchie
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>As stated in the Sustainability Appraisal: <i>“any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects ... relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants”</i></p> <p>Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure</p> <p>There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.</p> <p>Biodiversity (SA Objective 1)</p> <p>Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land.</p> <p>Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.</p> <p>Flood Risk (SA Objective 3)</p>

SA states it has found 'no predicted effects' against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road, floods regularly (please see picture below taken in January 2021) [see attachment].

Greenhouse gas emissions (SA Objective 4)

The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

Air Quality (SA Objective 5)

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites which do not encourage car use or increase congestion;
- the creation of a robust electric transport network;
- planning which ensures net zero emissions from new developments; and
- the creation of carbon fixation via rewilding and protection of natural habitats

Landscape & Townscape (SA Objective 9)

The SA and Plan sites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring, in terms of, design and site selection.

Housing (SA Objective 13)

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types and sizes of home (a minimum of 35% to be affordable housing), however, affordable needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will be less pressure to build on the greenfield sites.

Included files	EGS13059 Local Plan.jpg
Title	Question: Sustainability Appraisal
ID	EGS13102
Person ID	1270037
Full Name	MRS GINA BARLOW
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Some concerns include: Increased Flood Risk Again because Berkhamsted is situated in a valley during heavy rain and storms the drainage infrastructure often cannot cope. I have seen the road outside my house on many occasions turn into a small river, the tarmac has been lifted and

even main drains burst. Anything that reduces the ability of the land to drain and hold water at the top of the hills should be rejected. These sites are situated at valley tops and would lead to more water runoff effecting those lower down the hills.

Air Quality
The plan needs to provide a comprehensive analysis to ensure we have a plan which ensures the reduction of air pollution. We need to protect public health.d

All sites should therefore discourage car use, encourage walking and any development should have net zero emissions.

Included files

Title Question: Sustainability Appraisal

ID EGS13151

Person ID 1270066

Full Name Dr Amanda Cole

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as 'East of Tring'fails to meet the efficient use of land objective and yet

this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS13202

Person ID 1270127

Full Name Amy Moloney

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.?

Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.

This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.

Included files

Title Question: Sustainability Appraisal

ID EGS13221

Person ID 1270128

Full Name	Richard Salway
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>As stated in the Sustainability Appraisal: any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects and relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants</p> <p>Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure.</p> <p>There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.</p> <p>Biodiversity (SA Objective 1)</p> <p>Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land.</p> <p>Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.</p> <p>Flood Risk (SA Objective 3)</p> <p>SA states it has found 'no predicted effects' against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road, floods regularly (please see picture attached in appendix to Q6 answers, taken in January 2021).</p> <p>Greenhouse gas emissions (SA Objective 4)</p> <p>The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).</p>

Photo to support comments on Flood Risk (SA Objective 3) flooded land between Bulbourne Road and Station Road, in the largest area of proposed development in Tring. Picture taken January 2021.

[SEE ATTACHED PHOTO OF TRING SITE]

Air Quality (SA Objective 5)

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 m2 of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites that neither encourage car use nor increase congestion;
- the creation of a robust electric transport network;
- planning that ensures net zero emissions from new developments; and
- the creation of carbon fixation via rewilding and protection of natural habitats.

Landscape & Townscape (SA Objective 9)

The SA and Plan cites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring, in terms of design and site selection.

Housing (SA Objective 13)

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types, and sizes of home (a minimum of 35% to be affordable housing), however, 'affordable' needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will thus be less pressure to build on the greenfield sites.

Included files

[PHOTO 1.jpg](#)

Title

Question: Sustainability Appraisal

ID

EGS13235

Person ID

1258764

Full Name

Mark Bullard

Organisation Details

Tring Squash Club

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Tring Squash Club supports the objective to provide more foot and cycle paths. If the new sports facilities are located on the Dunsley Farm site then any investment in foot and cycle paths would improve foot and cycle access to the existing Cow Lane sports facilities.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13240
Person ID	1270143
Full Name	Mr Thomas Parsons
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <ol style="list-style-type: none"> 1 To protect, maintain and enhance biodiversity and geodiversity at all <p>Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000 + more people and their cats and dogs into them, can not be done without damaging biodiversity.</p> <ol style="list-style-type: none"> 1 To protect, maintain and enhance water resources (including water quality and quantity)

DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.

Development at the level proposed is simply not compatible with these 2 objectives.

With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.

Included files

Title Question: Sustainability Appraisal

ID EGS13242

Person ID 1270143

Full Name Mr Thomas Parsons

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment As outlined in my replies to Question 1 and 2 development on the scale proposed is neither sustainable nor necessary. The Sustainability Appraisal report lists the first 2 key objectives as follows:-

- 1 To protect, maintain and enhance biodiversity and geodiversity at all

Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000 + more people and their cats and dogs into them, can not be done without damaging biodiversity.

1 To protect, maintain and enhance water resources (including water quality and quantity)

DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.

Development at the level proposed is simply not compatible with these 2 objectives.

With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.

Included files

Title Question: Sustainability Appraisal

ID EGS13262

Person ID 1270148

Full Name Mr Carl Blackwell

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a

particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would

clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “East of Tring” fails to meet the efficient use of land objective and yet this isn’t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS13286

Person ID 1270157

Full Name Ms Claire Laing

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with

regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS13344
Person ID	1270207
Full Name	Ms Helena Thorpe Foulsham
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	

QUESTION: Sustainability Appraisal comment As outlined in previous replies to Question 1 and 2 development on the proposed scale is neither sustainable nor necessary.

The Sustainability Appraisal report lists the first 2 key objectives as follows:-

- 1 To protect, maintain and enhance biodiversity and geodiversity at all

Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000 + more people and their cats and dogs into them, can not be done without damaging biodiversity.

- 1 To protect, maintain and enhance water resources (including water quality and quantity) 6 Ways to Preserve Biodiversity
 - 1 Support local Regularly buying from small local farmers at stands or markets helps to keep finance in the local economy and supports agricultural efforts to conserve biodiversity. ...
 - 1 Save the bees! ...maintain the flowers, flora
 - 2 Plant local flowers, fruits and ...maintain the source
 - 3 Take shorter showers! ...with 16,000 new houses!!!
 - 4 Respect local ... A habitat meets all the environmental conditions an organism needs to survive. For an animal, that means everything it needs to find and gather food, select a mate, and successfully reproduce. For a plant, a good habitat must provide the right combination of light, air, water, and soil.
 - 5 Know the source! - a clip from the World Health Organization - ".....Threats to biodiversity and health

There is growing concern about the health consequences of biodiversity loss. Biodiversity changes affect ecosystem functioning and significant disruptions of ecosystems can result in life sustaining ecosystem... goods and services. Biodiversity loss also means that we are losing, before discovery, many of nature's chemicals and genes, of the kind that have already provided humankind with enormous health benefits.... "

Included files	
Title	Question: Sustainability Appraisal
ID	EGS13355
Person ID	490211
Full Name	Ms Barbara Saville
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years.</p> <p>Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse.</p> <p>This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13381
Person ID	1270224
Full Name	Ms Heather Wignall
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with</p> <p>regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical</p> <p>landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to</p>

allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS13407

Person ID 1270229

Full Name Homes England

Organisation Details

Agent ID 1270231

Agent Full Name Ms
Rebecca
Dewey

Agent Organisation Associate Director
WSP

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment The Council notes at paragraph 7.5 that it has progressed the Draft Plan on the basis on a housing need calculation of 922 dwellings per annum (dpa), which uses the method set out within the Government consultation as part of the Planning Reform White Paper (Autumn 2020). The Council acknowledges that there are uncertainties over using this figure and that there may be further changes set out by the Government and that it will be kept under review.

On 16 December 2020, the Government confirmed that councils should use an updated method which takes the original standard method and adds a 35% uplift for boroughs which contain the top 20 largest cities and urban areas (Planning Practice Guidance (PPG) paragraph reference ID: 2a- 004-20201216). This means that the housing need figure for Dacorum will revert back to 1,023dpa:

- The increase from 922dpa to 1,023dpa results in a total requirement of 18,414 homes across the Plan
- This is an increase of 1,818 homes above the 16,596 figure set out within the Draft At present, the Draft Plan contains a supply of 16,899 homes over the Plan Period, only marginally above the DBC's need when using the 922dpa figure.

As such, the DBC will need to update the Plan and find additional sources of housing supply in order to accommodate the higher level of need.

DBC will also need to update its Sustainability Appraisal. Currently, Options A to D are based on a housing target of 922dpa and only Option E considers a higher target of 1,100dpa. Option E does not specify a particular spatial strategy, so this will need to be addressed before the publication of the Regulation 19 Local Plan.

National guidance requires DBC to meet this need in full. There is a historic undersupply of housing in the area and the Council is currently unable to demonstrate a five-year supply of land for housing.

WSP understand that the latest calculation is that DBC can only demonstrate 2.8 years of housing land supply¹. This housing land supply calculation is based on the current housing target of 403dpa. With the emerging housing need of 1,023dpa set to increase this target by over 150%, the Council's housing land supply will fall to an even more critical level.

The 2020 Housing Delivery Test results, published on 19 January 2021, show that there has been a big reduction in housing delivery in DBC. The 2019 results showed that the Council was delivering 138% against its housing requirement but this dropped by 49% to 89% in the 2020 results. We understand that this means that the Council will now have to prepare an Action Plan to show how it will deliver the housing it needs.

Last year, DBC delivered just 522 homes against a target of 938dpa. This target was temporarily reduced by the Government from 1,023dpa, with a month's worth of demand being taken off due to the COVID pandemic. The next results will be based on a requirement of 1,023dpa and will require the Council to substantially increase housing delivery in order to avoid being hit with the requirement to add a 20% buffer to its housing target or face the most severe penalty, the "presumption in favour of sustainable development".

Further, affordability within DBC has worsened significantly over the last 10 years. The ratio of median house price earnings to median gross annual workplace-based earnings has gone up from 7.88 in 2009 to 12.21 in 2019, an increase of nearly 55%².

The issue of worsening affordability shows an acute need for housing placing greater emphasis on the council to exceed its housing requirement. As such, the Council should amend the Plan in order to meet in excess of 18,414 homes over the specified period.

Title	Question: Sustainability Appraisal
ID	EGS13426
Person ID	1270261
Full Name	MRS SAFFRON MURRAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	As outlined in my replies to Question 1 and 2 development on the scale proposed is neither sustainable nor necessary.
Included files	

Title	Question: Sustainability Appraisal
ID	EGS13447
Person ID	1270264
Full Name	MRS JANE BROWN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Proposals for development in east of Tring (Tr02 and Tr03) are on land protected as Green Belt adjacent to an Area of Outstanding Natural Beauty. The land makes an agricultural and ecological contribution to the wider area and there are no 'exceptional circumstances' identified to justify its loss to building development, particularly on the proposed scale. A decision to develop this land will be irreversible and irrevocably damage the local natural environment; it cannot be deemed sustainable.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS13451
Person ID	1270263
Full Name	MRS SHARON O'SULLIVAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	See previous comments reference Question 5
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13460
Person ID	1264853
Full Name	Nick Davis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Pollution will drastically increase due to increased car use. There will a strain on Water, waste, utilities, council services and local bus and rail networks due to a 30% population increase.

Current road quality in Berkhamsted is appalling enough without the increased traffic.

'Rat runs' will be used even more frequently - these roads tend to have cars parked on both sides due to on street parking for most residents. These will become even more congested and dangerous for children and elderly pedestrians.

Included files

Title Question: Sustainability Appraisal

ID EGS13474

Person ID 1270266

Full Name VANDA EMERY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

1) There would seem to be a notiable absense of and estimates of the construction emissions. It is critical the the emission from construction are included in the year that they are emitted, not spread over the life time of the building, as they are very significant. It is the global emission over the next few decades that determine whether humanity manages to limit climate change to 1.5C, and the lift time of the buildings built over the new few decades will be hundereds of years. So if objective is to limit global tempreture rise the emission created by the building of a house in dacorum (which are mostly embeded in construction materials) needs to be include in dacorums carbon budget for the year the house was built (as that is when the emission happen). Spreading emission over a hundared years is just creative accounting to avoid acknowledge the impact of construction, or allow construction that doesn't fit within carbon budgets.

2) "Low Carbon" is both a meaningless term (how low is low) and out of date with goverment policy. The goverment is committed to zero carbon so Local Plan needs to deliver a Zero carbon dacorum, not a 'low carbon' dacorum.

3) As I have already flagged the big challange of getting to zero carbon is about retorfiting existing buildings. it is therefore key that all new housing allow zero carbon lifestyles on day one. That means EV charger per parking space, and a much lower ration of parking spaces to occupants than currently. It means no natural gas on the site. It means PV built in on all south facing roofs and maximising south facing roof space. It means grey water recycling built in. Non of these are currently stipulation for all new development which is constrictary to the council climate emergancy declaration.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS13515
Person ID	1270285
Full Name	MARTIN WELLER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	

Title	Question: Sustainability Appraisal
ID	EGS13555
Person ID	1260521
Full Name	Steve Ritchie
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>As stated in the Sustainability Appraisal: <i>“any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects</i></p> <p><i>... relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants”</i></p> <p>Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure</p> <p>There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.</p> <p>Biodiversity (SA Objective 1)</p> <p>Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land.</p> <p>Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.</p> <p>Flood Risk (SA Objective 3)</p> <p>SA states it has found ‘no predicted effects’ against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road, floods regularly (please see picture below taken in January 2021).</p> <p>[PLEASE SEE PHOTO OF SITE IN TRING]</p>

Greenhouse gas emissions (SA Objective 4)

The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

Air Quality (SA Objective 5)

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites which do not encourage car use or increase congestion;
- the creation of a robust electric transport network;
- planning which ensures net zero emissions from new developments; and
- the creation of carbon fixation via rewilding and protection of natural habitats.

Landscape & Townscape (SA Objective 9)

The SA and Plan sites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring, in terms of, design and site selection.

Housing (SA Objective 13)

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types and sizes of home (a minimum of 35% to be affordable housing), however, affordable needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will be less pressure to build on the greenfield sites.

Included files

[Photo.jpg](#)

Title

Question: Sustainability Appraisal

ID

EGS13571

Person ID

1227768

Full Name

Ms Denise Young

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <p>1 To protect, maintain and enhance biodiversity and geodiversity at all</p> <p>Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000 + more people and their cats and dogs into them, can not be done without damaging biodiversity.</p> <p>1 To protect, maintain and enhance water resources (including water quality and quantity)</p> <p>DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.</p> <p>Development at the level proposed is simply not compatible with these 2 objectives.</p> <p>With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13573
Person ID	1227768
Full Name	Ms Denise Young

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <p>1 To protect, maintain and enhance biodiversity and geodiversity at all</p> <p>Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000 + more people and their cats and dogs into them, can not be done without damaging biodiversity.</p> <p>1 To protect, maintain and enhance water resources (including water quality and quantity)</p> <p>DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.</p> <p>Development at the level proposed is simply not compatible with these 2 objectives.</p> <p>With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13593
Person ID	1270310
Full Name	Ms Eleanor Jelf

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>Biodiversity: Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land. Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.</p> <p>Greenhouse gas emissions: Any development requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting.</p> <p>Air Quality: Transport is a key source of air pollution and so the plan needs to provide a comprehensive data analysis on the negative impact on air quality</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13614
Person ID	1270319
Full Name	Ms Nicola Withers
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	The scoring system doesn't take into account the full impact and the land "East of Tring" is too ambiguous.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13629
Person ID	1145871
Full Name	Mr Gareth Morris
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet</p>

this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS13642

Person ID 1270343

Full Name KEITH DELDERFIELD

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

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into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS13698

Person ID 1270359

Full Name Mr John Dowling

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I see a great deal of "Pro-development" within the appraisal but elements supporting the undersanding of proposed sites is, in many cases, limited. (see also Q7)

Included files

Title Question: Sustainability Appraisal

ID EGS13702

Person ID 1270361

Full Name Mr Jon Whysall

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <p>1 To protect, maintain and enhance biodiversity and geodiversity at all Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000+ more people and their cats and dogs into them, can not be done without damaging biodiversity. And putting a 10% net gain target on developers that will never be measured or achieved is just greenwash.</p> <p>1 To protect, maintain and enhance water resources (including water quality and quantity)</p> <p>Your own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. Thats another 7.5 million litres a day - minimum. There will be no water left to measure quality. You will kill the river and all the wildlife and biodiversity that depends on it - how are your developers going to offset that in their 10% net gain calculations?</p> <p>Development at the level you propose is simply not compatible with these 2 objectives.</p> <p>As outlined in my replies to Question 1 and 2 development on the scale proposed is neither sustainable nor necessary.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13717
Person ID	1263002
Full Name	Rhona Denness
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>Throughout this document I have described why I disagree strongly with the developments in Tring in relation to sustainability. Conclusions are not backed up by sufficient evidence or detail/commitment given to mitigating strategies.</p> <p>The plan identifies that a key sustainability issue is that <i>'Ashridge SAC/SSSI, Tring Park, Tring Reservoirs and the Grand Union Canal are all reported to be experiencing visitor pressures. As the urban population increases, pressures on access to the countryside and these key attractions will increase.'</i> My experience is that the pandemic has increased the use of these areas considerably and that this use is likely to continue as the benefits for peoples physical and mental</p>

wellbeing are clear. I believe that the impact of local traffic increase, pollution and visitor numbers would have a very negative impact on these sites and that of Tring Park SSSI. The impact of these should be considered alongside housing need. Government policy seems clear that councils have responsibilities for assessing housing need alongside local environmental concerns rather than the former trumping the latter. The planned provision of public park of around 20 hectares would in no way compensate for the loss of open land/countryside on Green belt land, and would further impact on the above areas.

I also have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS13731
Person ID	223941
Full Name	Mrs Cathy Davidson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13748
Person ID	1270368
Full Name	Mr Charlie Laing
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13788
Person ID	
Full Name	
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	The Sustainability Appraisal report lists the first 2 key objectives as follows:-

1 To protect, maintain and enhance biodiversity and geodiversity at all levels.

Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000+ more people and their cats and dogs into them, can not be done without damaging biodiversity.

1 To protect, maintain and enhance water resources (including water quality and quantity)

DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.

Development at the level proposed is simply not compatible with these 2 objectives.

With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.

Included files

Title Question: Sustainability Appraisal

ID EGS13790

Person ID

Full Name

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment

The Sustainability Appraisal report lists the first 2 key objectives as follows:-

- 1 To protect, maintain and enhance biodiversity and geodiversity at all levels.

Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000+ more people and their cats and dogs into them, can not be done without damaging biodiversity.

- 1 To protect, maintain and enhance water resources (including water quality and quantity)

DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.

Development at the level proposed is simply not compatible with these 2 objectives.

With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.

Included files

Title Question: Sustainability Appraisal

ID EGS13807

Person ID 1163978

Full Name John Wignall

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* **Yes**

* **No**

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn ' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site ' s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as " East of Tring " fails to meet the efficient use of land objective and yet this isn ' t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS13825
Person ID	1207914
Full Name	Maria Oliver
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	
* Yes	

* No	
QUESTION: Sustainability Appraisal comment	The planned housing should be carbon neutral New housing is likely to bring more car users to the area. The road infrastructure is already beyond capacity.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13839
Person ID	777073
Full Name	Mrs Anne Lyne
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	Chalk streams: Our chalk streams are sadly depleted, over-extracted. The River Gade ran dry in 2019. They are irreplaceable once gone and an important part of our environment. We are very fortunate to have them in this area – they and their ecosystems are precious. It is not clear how 28% more water for the extra population foreseen in this Plan will be obtained, or from where, as the chalk streams simply cannot provide it.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13855
Person ID	1270387
Full Name	Mr Richard Pilkinton
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>These documents are very hard to follow. It was interesting to read that they were not prepared by Dacorum Borough Council but by independent consultants TRL Ltd, appointed by DBC, and this is to meet legal requirements.</p> <p>London Road, Markyate site is ranked as 'Very unsustainable .. likely to have significant adverse impacts' in reducing flood risk.</p> <p>The appraisal would seem to pick up the points I have raised including the loss of employment areas in the centre of the village. It will be interesting to see if these points are acted upon.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13870
Person ID	611689
Full Name	Mrs Sheila Pilkinton
Organisation Details	Markyate Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>These documents are very hard to follow. It was interesting to read that they were not prepared by Dacorum Borough Council but by independent consultants TRL Ltd, appointed by DBC, and this is to meet legal requirements.</p> <p>London Road, Markyate site is ranked as 'Very unsustainable .. likely to have significant adverse impacts' in reducing flood risk.</p> <p>The appraisal would seem to pick up the points I have raised including the loss of employment areas in the centre of the village. It will be interesting to see if these points are acted upon.</p>
Included files	
Title	Question: Sustainability Appraisal

ID	EGS13880
Person ID	1270388
Full Name	Mr & Mrs David & Emma Robertson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>

Included files	
Title	Question: Sustainability Appraisal
ID	EGS13905
Person ID	1264756
Full Name	Kathryn Salway
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>As stated in the Sustainability Appraisal: “any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects ... relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants”</p> <p>Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure.</p> <p>There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.</p> <p>Biodiversity (SA Objective 1)</p> <p>Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land.</p> <p>Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.</p> <p>Flood Risk (SA Objective 3)</p> <p>SA states it has found ‘no predicted effects’ against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road, floods regularly (please see photo in Appendix).</p>

Greenhouse gas emissions (SA Objective 4)

The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

(See extra sheet of answers supplied)

Air Quality (SA Objective 5)

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites which do not encourage car use or increase congestion;
- the creation of a robust electric transport network;
- planning which ensures net zero emissions from new developments; and
- the creation of carbon fixation via rewilding and protection of natural habitats.

Landscape & Townscape (SA Objective 9)

The SA and Plan sites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring in terms of design and site selection.

Housing (SA Objective 13)

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types and sizes of home (a minimum of 35% to be affordable housing), however, affordable needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will be less pressure to build on the greenfield sites.

Included files	Kathryn Salway appendix (images) to Questions 3 and 6.pdf
Title	Question: Sustainability Appraisal
ID	EGS13917
Person ID	1207810
Full Name	Louisa Groves
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	The Habitats Regulation Assessment should have been carried out before the proposal was put forward.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13927
Person ID	1270392
Full Name	Ms Anna Skingley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has

brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Included files

Title Question: Sustainability Appraisal

ID EGS13949

Person ID 1145435

Full Name Mr Paul Crosland

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I do have concerns for the effects of the scale of development proposed on the availability of water supplies, the continued/ increasing extraction of water from aquifers, and the possible inadvertent pollution of water supplies caused as a result of development (clause 6.4.3 of the Sustainability Appraisal).

I also disagree with the conclusion in clause 6.4.11 that "the predicted impacts of the plan should have positive cumulative impacts against the objective to improve the health and wellbeing of the local population" which would be ".....achieved

through policies which support the improvements to housing, healthcare, education, the environment and facilities for leisure and recreation”. I have seen no evidence to support the view that such improvements would be realised by the proposals set out in the Draft Local Plan.

Included files

Title Question: Sustainability Appraisal

ID EGS13969

Person ID 1270381

Full Name Alexandra Das-Crosland

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I do have concerns for the effects of the scale of development proposed on the availability of water supplies, the continued/ increasing extraction of water from aquifers, and the possible inadvertent pollution of water supplies caused as a result of development (clause 6.4.3 of the Sustainability Appraisal).

I also disagree with the conclusion in clause 6.4.11 that “the predicted impacts of the plan should have positive cumulative impacts against the objective to improve the health and wellbeing of the local population” which would be “.....achieved through policies which support the improvements to housing, healthcare, education, the environment and facilities for leisure and recreation”. I have seen no evidence to support the view that such improvements would be realised by the proposals set out in the Draft Local Plan.

Included files

Title Question: Sustainability Appraisal

ID EGS13975

Person ID 1270411

Full Name Ms Jacqui Parr

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <p>1 To protect, maintain and enhance biodiversity and geodiversity at all</p> <p>Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000+ more people and their cats and dogs into them, can not be done without damaging biodiversity. And putting a 10% net gain target on developers that will never be measured or achieved is just greenwash.</p> <p>1 To protect, maintain and enhance water resources (including water quality and quantity)</p> <p>Your own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. Thats another 7.5 million litres a day - minimum. There will be no water left to measure quality. You will kill the river and all the wildlife and biodiversity that depends on it - how are your developers going to offset that in their 10% net gain calculations?</p> <p>Development at the level you propose is simply not compatible with these 2 objectives.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS13977
Person ID	1270411
Full Name	Ms Jacqui Parr
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <p>1 To protect, maintain and enhance biodiversity and geodiversity at all</p> <p>Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000+ more people and their cats and dogs into them, can not be done without damaging biodiversity. And putting a 10% net gain target on developers that will never be measured or achieved is just greenwash.</p> <p>1 To protect, maintain and enhance water resources (including water quality and quantity)</p> <p>Your own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. Thats another 7.5 million litres a day - minimum. There will be no water left to measure quality. You will kill the river and all the wildlife and biodiversity that depends on it - how are your developers going to offset that in their 10% net gain calculations?</p> <p>Development at the level you propose is simply not compatible with these 2 objectives.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14022
Person ID	1270425
Full Name	EMMA LELIEVELD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	As noted above, pedestrian and cycle routes to and from Berkhamsted town centre from the ridge area continue to be unsuitable and hazardous. In particular, pavements are narrow on both Shootersway (between the water tower and Cross Oak Road) and along Kings Road, and there is no pavement along sections of Cross Oak Road. Combined with the additional car and commercial traffic that will arise, further development of the ridge area of Berkhamsted would make it hazardous for pedestrians especially families with young children. There is no obvious plan in the draft Local Plan to address transport to and from the ridge area. Transport routes should be defined from the outset to encourage residents to use public transport in preference to private vehicles. As noted above, a previous petition for a shuttle bus service to and from the town centre secured a great deal of local support and this should be revisited as part of a more holistic approach to further development in the town.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14029
Person ID	
Full Name	
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	There is little evidence that sufficient analysis have been done on the environmental consequences of development, especially those that would require water pumped from the chalk aquifer, and the impact on the Gade/Bulbourne rivers.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14034
Person ID	1270428
Full Name	KIERAN HOLLAND

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <p>1 To protect, maintain and enhance biodiversity and geodiversity at all levels.</p> <p>Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000+ more people and their cats and dogs into them, can not be done without damaging biodiversity.</p> <p>1 To protect, maintain and enhance water resources (including water quality and quantity)</p> <p>DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.</p> <p>Development at the level proposed is simply not compatible with these 2 objectives.</p> <p>With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other electric transport and charging facilities should be incorporated into the plan.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14058
Person ID	1264962

Full Name	Courtney Culverhouse
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>I agree with Dacorum Green Party's comments on Sustainability. Biodiversity (SA Objective 1)</p> <p>We must achieve a genuine net gain in biodiversity. This can be achieved by rewilding and planting trees protected for future generations. We call for every 1 acre of green belt that is developed a further 2 acres are rewilded with public access. We call for Biodiversity and mandatory commitments to incorporate wildlife and wildlife corridors into every new development.</p> <p>Greenhouse gas emissions (SA Objective 4)</p> <p>This has been extensively covered in previous comments. We call for every new property to be net zero including Scope 3. It must be mandatory that every home is dual aspect and well insulated. Solar panels and heat pumps must be mandatory where it can be proved they will be efficient. The replanting of new woodland as suggested above could be used to offset carbon.</p> <p>Air Quality (SA Objective 5)</p> <p>Due to its topography air pollution in central Berkhamsted can be very poor. We must incorporate electrical vehicle charging points in every new home as a mandatory requirement to encourage electric vehicles along with solar energy to power them. We must invest in safe cycling routes and electric public transport. Tring has 2 electric charging points currently which is completely inadequate for its current population. Electric Vehicle charging points must be incorporated into existing Victorian housing stock in the towns to help mitigate any increase in air pollution by additional homes.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14067
Person ID	1270476

Full Name	ALISON CHESHIRE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Water - building more houses on a chalk aquifer which is already under strain from the use of ground water supply and climate change is unsustainable. The ecology of the chalk streams is of international significance. The Bulborne which has its source in Dudswell and flows through Northchurch has been affected by over extraction in recent years. Many residents already have problems with water pressure. This has worsened with the building of houses at Bearoc Park and is set to get worse. This impacts on the natural ecology of the stream. Without provision for increased water demand, or adequate sewerage, the plan is unsustainable.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14116
Person ID	1270501
Full Name	DAVID WHITE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	6.1 The Plan is not compatible the objectives of the Sustainability Appraisal (SA) Dacorum's Local Plan Interim SA Report November 2020 4.5 (page 24) assesses the compatibility between SA Objectives and Local Plan Objectives. In relation to Local Plan Objective: "Delivering Dacorum's future with homes for everyone", it concludes:

“This objective is potentially incompatible with a number of the SA objectives:

- The level of housing development required in the Borough will require development of greenfield land. Development of greenfield land is not compatible with biodiversity (SA1) due to landtake, potential habitat fragmentation and urban pollution issues. Development on greenfield land would also result in soil sealing (SA6).
- Providing new homes in the Borough will put direct pressure on water resources (SA2) which are already identified as ‘over-abstracted’.
- Housing development will result in increases in greenhouse gas emissions from new housing and associated activities (SA4). It will also contribute to background emissions through an increase in the number of vehicles on the road thereby reducing air quality (SA5). The objective also has uncertain compatibilities with a number of the SA objectives:
- Parts of the Borough lie within areas of flood risk and there is the potential for new housing sites to lie within these zones (SA3).
- Housing development on greenfield sites is potentially incompatible with the SA objectives on historic environment (SA8), and landscape / townscape (SA9).”

Similarly, the report details potential incompatibilities between SA objectives and two Local Plan Objectives: ‘Generating a vibrant economy with opportunities for all’, and ‘Enabling the delivery of infrastructure’.

The Local Plan should remove the word “potentially” and acknowledge that Local Plan Objectives are not compatible with sustainability.

The proposed developments contain insufficient social housing to meet local needs. For example, a semi-detached house in the Bearroc 2 site, adjacent to the new Northchurch developments, is priced between £500,000 and £800,000. This is beyond the means of people in Dacorum who need housing.

Included files

Title Question: Sustainability Appraisal

ID EGS14136

Person ID 1263506

Full Name Ian Brown

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14155
Person ID	1163439
Full Name	Lindy Weinreb
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Spatial Strategy and Growth Water availability Appendix C17 The comment reflects the concerns residents have about the aquifer and abstraction, set out in stark terms</p> <p>This is a strong indicator about the need to plan for a key infrastructure requirement: the 2031 horizon is barely mid-way through the Draft Plan period. It will not be enough to rely on assumptions that utility providers will deliver under their statutory obligations.</p> <p>Landscape C27</p> <p>The SA final paragraph on p27 says</p> <p>While the term ‘irreversible’ is explicitly recognised for this Option [large scale release of Green Belt], this and the adverse impact on AONB is only implied where loss of Green Belt is proposed for other Sites.</p> <p>Sustainable Locations C31</p> <p>The bus route 500 operates as a commercial service by Arriva at a frequency of 3 buses per hour on Monday-Friday, 2 buses per hour on Saturdays and 1 bus per hour on Sunday shopping hours. There is no evening service or early service on Saturdays. Due to its length, it also suffers from reliability issues. Despite fulfilling the criteria of a “good public transport service” in the Topic papers, there is a paucity of services in other directions from Berkhamsted. I do not agree that a sustainable transport network is in place in Berkhamsted.</p> <p>APPENDIX E ASSESSMENTS OF DRAFT LOCAL PLAN PROPOSALS AND SITES</p> <p>The following abstracts from the site assessments show a common theme –</p> <ul style="list-style-type: none"> • the distance from the town centre, • the gradient serving to discourage walking or cycling, • absence of alternative public transport. <p>Also their proximity to the A41 - its ambient and peak noise levels may have an adverse effect on Health and Wellbeing to residents unless effective mitigation measures are adopted.</p> <p>The Attachment with this reply suggests that transport routes should be defined from the outset to encourage residents to use public transport in preference to private vehicles.</p> <p>E.2 BERKHAMSTED SITES</p> <p>Site Reference South of Berkhamsted: Page E38 Points 4,5,10,11</p> <p>Site reference: Land adj. to Blegberry Gardens, Shootersway, Berkhamsted E44 Points 4,5,10,11</p> <p>Site Reference: British Film Institute Archive, Berkhamsted E46 Points 4,5,10,11</p>
Included files	

Title	Question: Sustainability Appraisal
ID	EGS14175
Person ID	1270552
Full Name	Mr Michael Friend
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I strongly object to the council completely desecrating the countryside, listed as an area of natural beauty, by building three thousand dwellings at Long Marston. Spoiling the beautiful countryside for generations to come. Please rethink this</p> <p>I strongly object to the council completely desecrating the countryside, listed as an area of natural beauty, by building three thousand dwellings at Long Marston. Spoiling the beautiful countryside for generations to come. Please rethink this</p>
Included files	

Title	Question: Sustainability Appraisal
ID	EGS14194
Person ID	1253654
Full Name	Jodie Bell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that sites relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as</p> <p>'East of Tring' fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p> <p>As stated in the Sustainability Appraisal: "any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects..... relating to</p> <p>habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants"</p> <p>Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14222
Person ID	1270581
Full Name	MR & MRS DUNCAN
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14262
Person ID	1152075
Full Name	Rob Wakely
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>As stated in the Sustainability Appraisal: <i>“any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects ... relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants”</i></p> <p>Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure</p> <p>There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.</p> <p>Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land.</p> <p>Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.</p> <p>SA states it has found ‘no predicted effects’ against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road, floods regularly (please see picture below taken in January 2021).</p>

The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites which do not encourage car use or increase congestion;
- the creation of a robust electric transport network;
- planning which ensures net zero emissions from new developments; and
- the creation of carbon fixation via rewilding and protection of natural

The SA and Plan sites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring, in terms of, design and site selection.

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types and sizes of home (a minimum of 35% to be affordable housing), however, affordable needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will be less pressure to build on the greenfield sites.

Included files	14262.jpg
Title	Question: Sustainability Appraisal
ID	EGS14268
Person ID	1270624
Full Name	ROD MACGILLIVRAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Sustainability Appraisal comment	<ul style="list-style-type: none"> The sites proposed for development in this draft Local Plan have been evaluated and categorised based on ‘suitability, availability and achievability’ in the <i>Site Assessment Study for Dacorum Borough Council</i> dated January 2020 and compiled by consultants They state: <p><i>“This site assessment study comprises an independent, impartial and technically- focussed appraisal of the suitability, availability and achievability of 144 sites submitted to Dacorum Borough Council at various points in recent years for residential or employment development.”</i> (my emphasis)</p> <p>This makes it clear that the site assessment study does not assess where development would strategically be best located for the sustainable development of Dacorum, but simply reactively evaluates only that land which has been proposed by land-owners or developers.</p>

This means that the best and most sustainable locations for development in Dacorum may not have been considered at all, condemning the future growth of Dacorum to be driven primarily by developers' available land, even if this is the least suitable location from other perspectives such as transport, infrastructure and sustainability.

This approach is fundamentally wrong for the strategic importance of this Local Plan. Surely a Plan which will determine the course and location of development in the borough over a sixteen year period, and which sets the pattern of settlement in the borough for all future generations, should be strategic in its vision and proposals. This draft Local Plan is not – it sets the bar at the lowest level possible in terms of settlement strategy, by simply adopting development locations that are currently proposed by developers or land-owners. Our children and their children are consequently condemned to live in the wrong place by this plan. Wrong because it substantially violates the green belt which can never be recovered, and because the increase in road use that will result from locating development furthest from existing transport nodes will cause an increase in pollution and greenhouse gas emissions.

- One of the objectives of the site assessment study states:

*“Although this study is not a Strategic Housing Land Availability Assessment (SHLAA) in the sense that there was no need to carry out another Call for Sites and **its scope is limited to land outside existing settlement boundaries**, it shares key objectives with the SHLAA process and **could be considered a rural counterpart to the urban SHLAA work**. The most obvious similarity is that, like a SHLAA, the key study objective is to determine the suitability, availability and achievability **of all sites**.”* (my emphasis)

It is surely not acceptable that the assessment process limits its scope to land outside existing settlement boundaries. Why should the growth of urban Dacorum be focussed on rural areas? Saying that a study objective is ‘*to determine the suitability, availability and achievability of all sites*’ is simply not true if the study only considers sites presented by developers.

- The Site assessment Study states:

“The Council can be confident that greenfield sites are most likely to be deliverable and have capacity to bear developer contributions over and above CIL. The viability of brownfield sites is less certain, particularly in lower value areas.”

This shocking statement of bias towards using greenfield land is contrary to government policy that development should preferably be focussed on brownfield land and recent statements that the Green Belt should be protected.

Furthermore it guides growth and development towards peripheral locations which by definition are less sustainable, and is an unacceptable precursor to the Local Plan proposing to wipe out 746 hectares of Green Belt land.

- It is important to review and understand the previous studies that should inform this draft Local One such study is the Dacorum Borough Council Settlement Hierarchy Study, published in October 2017. This document states in section 1.2 of the Introduction:

“The purpose of a settlement hierarchy is to guide development so that it is:

- *provided in areas with access to the widest range of essential services and facilities*

where the need to travel is minimized;

- *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**;*
- *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**).*” (My emphasis)

It is evident that this logical statement of purpose is not followed in the draft Local Plan. The largest proposed development sites (HH01 and HH02 – the location of the so- called Hemel Garden Community) are not in locations with easy access to essential services, and do not minimize the need for travel. There is no existing infrastructure nor existing services to cope with this additional growth. Existing travel and community infrastructure is nowhere near – there is no existing choice of transport modes to access these and people will need to use private vehicles.

- The Settlement Hierarchy Study assesses Hemel Hempstead as one location in ranking the hierarchy and concludes it is a good place for further development . This is unsound

– Hemel is simply too large to assess in this way. If the proposed Hemel Garden Community sites are split out and evaluated against the criteria used in the audit of accessibility (Section 4.4) in this study, they would rate poorly. For example the only ‘higher order service’ reasonably close is a supermarket (although arguably still not

walking distance); there are not at least six key services existing in the area; and the sites would rate as ‘limited’ on the accessibility audit given that they are more than 5km from the nearest railway service. In fact, if Picott’s End had been

ranked in this hierarchy (it wasn't, probably because it is too small, but it should have been as it is the closest existing settlement to the proposed new Hemel Garden Communities sites) it would have ranked as 'Low' to 'Poor'.

- Much of the work on the Local Plan would have been carried out before the massive impact of the Coronavirus pandemic was understood. It is likely that many changes brought about by the pandemic will become long-lasting and embedded in the way society works. The migration away from office working could result in substantial town centre employment locations becoming available for residential use in substantially more sustainable locations than peripheral Green Belt

As noted, the extent of this impact was unknown while the Plan was being drafted. However given the generational impact the Plan will have on the future of Dacorum, it would be sensible to pause and review town centre opportunities that have emerged or are likely to emerge following the impacts of the pandemic. Ploughing on with proposals to develop in rural or peripheral areas on greenfield land where there are no services, transport, or social infrastructure in the light of changes emerging from the pandemic is simply not sensible. It would place people furthest from existing infrastructure, and will not take advantage of new town centre locations that will come available, meaning these may remain derelict.

- The Site Assessment Study includes as section 3 a "Policy and Evidence Base Review". The key findings of this review are summarised as follows:

"Growth should be sited to ensure the following outcomes:

- *Development that is environmentally, socially and economically sustainable;*
- *A mixture of differently sized sites to meet a range of development needs;*
- *Prioritisation of development on brownfield rather than greenfield land, and avoidance of isolated greenfield development in the countryside except in exceptional circumstances;*
- *Prioritisation of growth according to the defined settlement hierarchy;*

- *Avoidance of key constraints identified in the evidence base including but not limited to Green Belt land, heritage and environmental designations, areas of high landscape sensitivity, areas of high agricultural quality and areas of high flood risk; where this is not possible, or where other criteria combine to indicate development is more suitable, mitigation of negative effects.*
- *Ensuring areas of growth are sufficiently supported by appropriate services and infrastructure including transport, utilities, community and green infrastructure, a sufficient retail offer and jobs.*
- *Reduction of the need to travel and maximise use of sustainable modes of transport.”*

When considering the largest site proposed for development in the Local Plan, namely the Green Belt area to the north of Hemel Hempstead (the so-called ‘Hemel Garden Community’) it is noted that it does not meet national and local policy as a development site in each of the aspects above highlighted in yellow.

- I note that a further land availability assessment document has been published: this is the *Strategic Housing Land Availability Assessment – Addendum to the AECOM Site Assessment Study* published by Dacorum Borough Council and dated November The document states:

“This addendum reviews the suitability of additional sites put to the Council since the completion of the Site Assessment Study conducted by AECOM in January 2020.”

Again this addendum is therefore not a strategic land assessment. It simply evaluates, using the same criteria as in the original AECOM report, additional sites that have been put to Dacorum since the AECOM study.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS14296
Person ID	1270631
Full Name	SIMON LEGG
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	The area has already suffered with the development of Bearoc Park. We do not need more development using the areas natural resources.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14306
Person ID	1259141
Full Name	Kirsten Riemer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as “East of Tring” fails to meet the efficient use of land objective and yet this isn’t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS14330

Person ID 1270637

Full Name TOM GROVES

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment Too many houses proposed for the scheme to be sustainable.

Included files

Title Question: Sustainability Appraisal

ID EGS14334

Person ID 1270635

Full Name Catherine Bright

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14359
Person ID	1270641
Full Name	WILLIAM ALLEN
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>WATER: While the plan acknowledges that our local water resources are under extreme pressure, from the use of ground water for water supply and from climate change, it does not go far enough to protect the globally-rare Chalk streams in Dacorum by limiting the scale of house building.</p> <p>The plan proposes an increase in our population of up to 28% which is incompatible with the Council's commitment (2019 motion in Full council) to protect these important ecosystems, particularly when Policy DM33 of the Local Plan states the objective of avoiding "the need to abstract water from the ground, in particular from the Rivers Ver, Gade and Bulbourne catchments".</p> <p>The details on the proposed sites for development, many of which are in the valleys of these chalk streams, do not provide any detail on how the negative impacts on our chalk streams will be mitigated against.</p> <p>CLIMATE: The plan does yet provide sufficient details to indicate how carbon emissions from the building and use of new homes will align with the government 2050 net zero target. Given the scale of building proposed, and even if this is significantly reduced, there is a clear conflict between plans for more building, significantly more Co2-producing population, and Co2 targets. The Future Homes Standard will from 2025 require an even higher standard of carbon emissions reduction, with fossil fuel burners banned in new homes from this point, with a carbon emissions reduction of 75 to 80% compared to the current standard. Government has also advised, that to ensure industry is ready to meet the new standards by 2025, new homes will be expected to produce 31% lower carbon emissions from 2021.</p> <p>The carbon cost of removing land from Green belt is also significant. Soil is a large absorber of CO2, and when it is dug up and built over much of this is released, not to mention the lost future absorption. Sustainable development in Dacorum needs to be based on a clear understanding of baseline CO2 emissions in the Borough, including acknowledgment in the Local Plan of the carbon cost of removing land from greenbelt. The Borough and developers need to calculate the carbon loss and increased emissions of:</p> <ul style="list-style-type: none"> • Removing any land from green belt or green field. • Building the houses, including carbon cost of materials involved and cost of transporting those materials. • Using those houses , eg heating, and providing electricity for their occupants. • travelling to and from those houses.

- Expected carbon cost of dismantling and disposal of the assets at the end of life (this will encourage developers to use recyclable materials).

TRANSPORT & INFRASTRUCTURE: Dacorum and Hertfordshire does not have the infrastructure to reduce car dependency. Apart from access to London by train, the Local Plan does not include any infrastructure or investment to avoid a massive increase in car usage and volumes of traffic on roads. Many new developments in the plan are far from the train stations in Dacorum, and there is no explanation provided as to how the people who live in these homes will travel to and from work or the nearest station.

Included files

Title Question: Sustainability Appraisal

ID EGS14382

Person ID 1270640

Full Name Geoffrey Llewellyn

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment DBC ignores the post-pandemic effects. It grossly underestimates windfall developments, it does not assess the use of brownfield sites or the in-filing that could easily take place in Hemel Hempstead where there are large areas of unused mown grass (not environmentally beneficial – no meadow flowers etc.) and poorly maintained public open spaces that are scarcely used. All of these could provide excellent affordable terraced housing without encroaching on the Green Belt and make proper use of existing transport and civic facilities.

Included files

Title Question: Sustainability Appraisal

ID EGS14383

Person ID 1270640

Full Name Geoffrey Llewellyn

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I endorse everything said here by CRPE and BRAG with the proviso that there should be much much more infilling within Hemel Hempstead to balance the housing density in the various towns in the Borough.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14407
Person ID	1270653
Full Name	NEIL BRANCH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>More housing, therefore more hard surfaces, would create increasing strain on the drainage infrastructure, which already struggles to cope during heavy rain. the roads heading up the valley from town often have large amount of surface water due to the drains being unable to take the existing strain. Development would only exacerbate the problem.</p> <p>The plan needs to outline exactly how it proposes to have considered the levels of air pollution development would create. Sites should encourage walking, discourage vehicle use and development have a net zero emmissions</p>
Included files	
Title	Question: Sustainability Appraisal

ID	EGS14423
Person ID	1270662
Full Name	MAX GOODE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>LCR and NR generally support the scoring used to assess the sustainability of each potential draft allocation, however, wishes to make specific comments on the following score for Site. Where no comment has been provided, LCR agree with the score given:</p> <ul style="list-style-type: none"> • Biodiversity: Ecological surveys are in the process of being commissioned and will be prepared to support any forthcoming planning application for the Site. Once these assessments have taken place, we consider that we will be able to provide more clarity on this element of the • Landscape/Townscape: The proposed development has been designed so that it contributes positively to the surrounding landscape and townscape. We therefore consider that the score should be at least '<i>The option is likely to have a positive effect which is not significant</i>'. • Community Cohesion: The proposed development has been considered by the Community Review Panel, and links to the immediate surroundings and the wider community in Hemel Hempstead are a priority for the proposed development. We therefore consider that the score should be at least '<i>The option is likely to have a positive effect which is not significant</i>'. • Housing: The draft Allocation represents a highly sustainable brownfield Site, which in line with National Planning Policy should be prioritised for development. The highly sustainable nature of the Site provides an opportunity for high quality, high density development and therefore is able to contribute significantly to housing delivery within Hemel Hempstead. We therefore consider that the score should be '<i>The option is likely to have a significant positive effect</i>'. The increased site capacity <p>should be reflected within Appendix E of the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Interim Sustainability Appraisal Report Appendices.</p>

- **Employment and Skills:** The proposed development will create a significant level of local jobs, during construction and following completion. We therefore consider that the score should be *'The option is likely to have a significant positive effect'*.

Included files

Title Question: Sustainability Appraisal

ID EGS14440

Person ID 1270665

Full Name Cllr Stephen Claughton

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment Water is supplied by the local aquifer, which also feeds the chalk streams. The Environment Agency say that abstraction is to be restricted to current levels, which begs the question of how the new housing will be supplied with water. Given that climate change may reduce rainfall, assurance is needed that the water supply is not threatened by increased housing numbers.

Included files

Title Question: Sustainability Appraisal

ID EGS14457

Person ID 1265051

Full Name Edmund Knox

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn ' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site ' s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as " East of Tring " fails to meet the efficient use of land objective and yet this isn ' t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14467
Person ID	1270669
Full Name	Taylor Wimpey Taylor Wimpey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

<p>Yes / No * Yes * No</p>	
<p>QUESTION: Sustainability Appraisal comment</p>	<ul style="list-style-type: none"> • In respect of the Sustainability Appraisal process, Taylor Wimpey is generally satisfied with the overall approach taken which has concluded that Bk06 is one of the strongest performing sites in Berkhamsted. However, we consider that site specifics have not been appropriately taken into account, which has resulted in unfairly conservative scoring in some • For objective 1 biodiversity, the SA gives Bk06 a negative 'û' However, this does not take into account the currently de-graded nature of the site or the Green Infrastructure provision proposed by the Illustrative Masterplan, which incorporates significant new tree planting and creation of new habitats to deliver 10% net gain in biodiversity across the site. Furthermore, the scheme commits to providing a new country park. The site should therefore receive at least a neutral '?' score for this objective as a starting point, whilst recognising the biodiversity improvements which can be delivered at this site. • For objective 3 flood risk, a blank score is As the site is in flood zone 1 and at the lowest risk of flooding from all sources and is therefore sequentially preferable for residential development. As such, a positive 'ü' score should be given for this objective to recognise the potential for further improvements through the introduction of sustainable urban drainage systems. • In respect of objective 4 Climate Change, the SA provides a negative 'û' score by virtue of the site's distance from the town centre. However, this fails to recognise the opportunities for encouraging take up of sustainable modes of travel through good design and the creation of walkable neighbourhoods and the overall policy objectives of the emerging Local Plan to coordinate the development of West of Berkhamsted to provide a mix of land uses to serve the day-to-day needs of the community, reduce energy consumption and deliver a comprehensive green infrastructure network and biodiversity net On this basis, it is considered the site should have a neutral '?' score against this objective, with scope to improve upon this. • In terms of objective 8 historic environment and objective 9 landscape, the SA gives the site negative 'û' scores. As discussed above, a landscape-led and sensitive approach to heritage assets has been taken in the masterplanning of the Design principles can therefore be incorporated to successfully mitigate any heritage and landscape impact resulting from the development of the site. On this basis, it is considered the site should have a neutral '?' score for these two objectives.
<p>Included files</p>	

Title	Question: Sustainability Appraisal
ID	EGS14506
Person ID	1270685
Full Name	Ms Jan Kerry
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>

Included files	
Title	Question: Sustainability Appraisal
ID	EGS14516
Person ID	1270383
Full Name	Mr Nigel Kerry
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p>

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS14532

Person ID 1270690

Full Name Akzo Nobel CIF Nominees Ltd

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment The next iteration (Regulation 19) Sustainability Appraisal (SA) should also specific reference should be made to paragraph 32 of the NPPF:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)”.

Our client notes that the Council’s SA acknowledges an OAN of 922 dpa but does not recommend growth Option E (Higher growth of 1,100 dwellings per annum) to be taken forward into the next stage (Regulation 19) of the new Local Plan despite this option being recognised as having potential to give rise to “significant positive effects on the SA13 – Housing”. Growth Option E makes provision for 1,100 dpa and therefore exceeds the current OAN and the Government’s new Standard Method requirement for 1,023 dpa.

It is noted Option E was discounted in the absence of evidence justifying the need for a higher-growth option and concern for potential significant negative effects in relation to SA Objectives SA6 – Soils and SA9 – Landscape. DBC should re-review their preferred growth option (Option Ci) to ensure new sites such as Land at 168-192 High Street, Berkhamsted can be allocated for either for residential-led mixed use or later-living housing to accommodate growth as per the Government’s new Standard Method. The Council need to assess whether the significant negative effects can be mitigated and on balance, whether the provision of additional growth and homes outweighs any associated harm in accordance with paragraph 32 of the NPPF. Moreover, it is noted that the current evidence base is being supplemented and this could help support a revised growth option.

Furthermore, it is essential that for the new Local plan to be found to be “positively prepared” and “justified” it will need to achieve sustainable development and assess all reasonable growth options in accordance with paragraph 35 of the NPPF.

Included files

Title Question: Sustainability Appraisal

ID EGS14542

Person ID 1163978

Full Name John Wignall

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn ' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site ' s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of

individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined

as " East of Tring " fails to meet the efficient use of land objective and yet this isn ' t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS14573

Person ID 1270700

Full Name Mr Peter Sims

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment

- There would seem to be a notable absence of and estimates of the construction emissions. It is critical the the emission from construction are included in the year that they are emitted, not spread over the life time of the building, as they are very significant. It is the global emission over the next few decades that determine whether humanity manages to limit climate change to 1.5C, and the life time of the buildings built over the next few decades will be hundreds of years. So if objective is to limit global temperature rise the emission created by the building of a house in dacorum (which are mostly embedded in construction materials) needs to be included in dacorum's carbon budget for the year the house was built (as that is when the emission happens). Spreading emission over a hundred years

is just creative accounting to avoid acknowledge the impact of construction, or allow construction that doesn't fit within carbon

- “Low Carbon” is both a meaningless term (how low is low) and out of date with goverment policy. The goverment is committed to zero carbon so Local Plan needs to deliver a Zero carbon dacorum, not a ‘low carbon’
- As I have already flagged the big challange of getting to zero carbon is about retorfitting existing it is therefore key that all new housing allow zero carbon lifestyles on day one. That means EV charger per parking space, and a much lower ration of parking spaces to occupants than currently. It means no natural gas on the site. It means PV built in on all south facing roofs and maximising south facing roof space. It means grey water recycling built in. Non of these are currently stipulation for all new development which is constrictary to the council climate emergancy declaration.

Included files

Title Question: Sustainability Appraisal

ID EGS14599

Person ID 1270709

Full Name Mr Rodney Tucker

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment

The Sustainability Appraisal report lists the first 2 key objectives as follows:-

- 1 To protect, maintain and enhance biodiversity and geodiversity at all

Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000 + more people and their cats and dogs into them, can not be done without damaging biodiversity.

1 To protect, maintain and enhance water resources (including water quality and quantity)

DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.

Development at the level proposed is simply not compatible with these 2 objectives.

With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.

Included files

Title Question: Sustainability Appraisal

ID EGS14601

Person ID 1270709

Full Name Mr Rodney Tucker

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment As outlined in my replies to Question 1 and 2 development on the scale proposed is neither sustainable nor necessary.

Included files

Title Question: Sustainability Appraisal

ID EGS14606

Person ID	1270714
Full Name	Mr Kevin kelly
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>The Sustainability Appraisal report lists the first 2 key objectives as follows:-</p> <p>1 To protect, maintain and enhance biodiversity and geodiversity at all</p> <p>Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000 + more people and their cats and dogs into them, can not be done without damaging biodiversity.</p> <p>1 To protect, maintain and enhance water resources (including water quality and quantity)</p> <p>DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.</p> <p>Development at the level proposed is simply not compatible with these 2 objectives.</p> <p>With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14608

Person ID	1270714
Full Name	Mr Kevin Kelly
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	As outlined in my replies to Question 1 and 2 development on the scale proposed is neither sustainable nor necessary.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14622
Person ID	1270726
Full Name	Mr Renshaw Watts
Organisation Details	Pennard Bare Trust
Agent ID	1270725
Agent Full Name	Mr David Carlisle
Agent Organisation	AECOM
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Dacorum Local Plan Interim Sustainability Appraisal Report (November 2020) Some of the key sustainability issues and opportunities identified in the Sustainability Appraisal (SA) include a requirement for affordable housing in accessible locations. This opportunity was retained through SA framework objective 13: "Ensure that everyone has access to good quality housing that meets their needs". High quality rural housing would help to support the vitality of Flamstead.

Furthermore, the SA identified some incompatibilities between the Draft Local Plan and SA objectives, namely that parts of the borough are located in Flood Zones with potential housing sites identified within these. The two sites in question are not at risk from flooding.

Additionally, the SA states that “the level of housing development required in the Borough will require development of greenfield land. While the proposed site allocations in Flamstead lie within the greenbelt on greenfield sites, they do not lie on any environmental designations and benefit from access to public transport and a direct access to the M1 via Junction 9. Furthermore, while the sites would constitute land take they would support the council’s ambitions with regards to affordable housing.

The SA has assessed the housing provision based on 16,565 homes and does consider a higher housing target based on the Government’s revised housing assessment method. The SA therefore does not consider the further housing requirement resulting from the new method. Revisions to the SA in future should treat our clients sites as reasonable alternatives for future housing growth.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS14630
Person ID	1270729
Full Name	MR & MRS A HOUGHTON
Organisation Details	
Agent ID	1270728
Agent Full Name	MS KAREN GALLEY
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Sustainability Appraisal comment

I note in the Sustainability Appraisal for Tring that objectives for climate change, soils, landscape and Townscape are likely to have adverse impacts, albeit defined as ‘minor’.

- The new development proposed to the east of Tring is on agricultural land which is classified as the ‘best and most versatile’.
- Although some significant adverse effects have been identified. The Sustainability Appraisal states that policies aimed at protecting open spaces and limiting development in the countryside and on open land should help to preserve the natural environment and biodiversity.

I am therefore concerned about the appropriate level of assessment of environmental impact.

For Historic environment the consideration is uncertain.

- Tring has quite a rich and significant history and this can be seen and felt within the centre, and draws a lot of people for leisure and tourism. This should not be compromised

Whilst the intent to build developments which have facilities within their boundaries, (Is this a J

- Three developments will potentially lead to increased traffic on the confined centre of -Tring and its narrow High Street
- increasing air pollution.
- The cumulative impact of the three proposed developments in Tring has not been considered.

I note that at the Regulation 19 stage the SA Report will also provide details of the monitoring which will be required to monitor the significant environmental effects and wider sustainability effects of implementing the Local Plan. In an ideal world this would enable any unforeseen adverse effects to be identified at an early stage and to enable appropriate remedial actions.

- However, history illustrates when the wheels of development are in motion there is no going back. The need for proved rigorous impact assessment pre-implementation is imperative.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS14640
Person ID	1270731
Full Name	MRS JOAN EELEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

QUESTION: Sustainability Appraisal comment

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Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS14650
Person ID	1265051
Full Name	Edmund Knox
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn ' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site ' s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as " East of Tring " fails to meet the efficient use of land objective and yet this isn ' t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14668
Person ID	860814
Full Name	Mrs Clare Joyce
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	Insufficient time to review
Included files	
Title	Question: Sustainability Appraisal
ID	EGS14684
Person ID	1270739
Full Name	HELEN OSBORNE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site' s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as " East of Tring" fails to meet the efficient use of land objective and yet this isn' t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion</p>

into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS14694

Person ID 1270740

Full Name JOHN OSBORNE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

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development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS14706

Person ID 1270752

Full Name DOUGLAS CANNON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Included files

Title Question: Sustainability Appraisal

ID EGS14718

Person ID 1270753

Full Name ANNE PIKE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would

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Included files

Title Question: Sustainability Appraisal

ID EGS14767

Person ID 1270760

Full Name LQ Estates

Organisation Details LQ Estates

Agent ID 1270759

Agent Full Name Miss
Hanna
Mawson

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment 7.0 This consultation includes an Interim Sustainability Appraisal (ISA) Report. It is acknowledged that the SA will continue to be updated as the Plan progresses. The SA identifies a total of 15 Framework Objectives across a variety of topic areas. These are generally supported and it is agreed that these are generally compatible with the Local Plan Strategic Objectives. It is noted that Local Plan Objective delivering Dacorum's future homes for everyone has some potential incompatibility with certain SA objectives however this is an important aspect of the Local Plan and some potential incompatibility may be addressed through suitable mitigation as proposals evolve.

7.1 Objective 6 make efficient use of land and protect soils (abbreviated to soils) should also ensure that allocated land is developed efficiently.

7.2 In terms of the spatial strategy, the SA clearly sets out the various options considered by the Council and the reasons for selecting Option Ci: Spread across the six main settlements (low growth at villages). This is reflected in the spatial strategy of the Plan set out at Policy SP2. Options A-D are all based on growth level of 922 dwellings per annum, Option E considered 1,100 dwellings per annum. As set out in Section Two of this representation, the growth level will need to

reflect the standard method figure of 1,023 as a minimum. Other factors including affordability and economic growth aspirations will need to be considered further to establish whether an additional allowance above the minimum is appropriate. However the spatial approach of concentrating growth at the six main settlements with low growth at villages is generally supported as it appropriately distributes growth to sustainable locations in line with SA Objective 11.

7.3 The SA assesses each site considered as being a reasonable alternative against the SA objectives using the same methodology from the 2017 SA for the Schedule of Site Appraisals. The SA assessment for New Mill is discussed further in Section 8.

7.4 The comments at 6.7 around mitigation being ‘built-in’ to the Plan through both strategic and detailed policies is generally supported. As proposals for specific sites evolve further detail will be provided regarding mitigation for specific allocations. This is discussed further in Section 8.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS14788
Person ID	1142710
Full Name	Mr Chris Stoneman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that sites relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measures within the Assessment.

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Included files

Title Question: Sustainability Appraisal

ID EGS14799

Person ID 1270798

Full Name SAYED BEL-BAROO

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site' s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Included files

Title Question: Sustainability Appraisal

ID EGS14828

Person ID 1270804

Full Name Dr Jessica Field

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION: Sustainability Appraisal comment I have several specific concerns in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

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Pollution and congestion impacts of increased traffic.

In addition to concerns over assessment method, the proposal also insufficiently engages with the sustainability implication of increased traffic in Tring (SA Objective 4). Government statistics state that 76% of households have access to a car with 32% having two or more vehicles (Department for Transport, 2016). The likelihood of the proposed houses in Tring being multiple car ownership properties increases significantly with the higher occupancy potential of the proposed houses, the additional space the developers will create for parking, and the income levels of those able to afford to live in the new properties.

This proposal lacks a full and accurate assessment of potential traffic impacts in Tring specifically – including pollution, congestion and noise. Tring already suffers from traffic congestion bottlenecks in key roads, and lack of walkable amenities and no cycle lanes will encourage the increased use of vehicles.

This plan will have serious implications on Dacorum's (and Tring's) ability to tackle the climate crisis and maintain sustainable levels of emissions.

Department for Transport (2016) Road Use Statistics, Great Britain. <https://www.licencebureau.co.uk/wp-content/uploads/road-use-statistics.pdf>

Included files	
Title	Question: Sustainability Appraisal
ID	EGS14857
Person ID	1270808
Full Name	Westmorland Limited
Organisation Details	Westmorland Ltd

Agent ID	1270759
Agent Full Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>The SA assesses each site considered as being a reasonable alternative against the SA objectives using the same methodology from the 2017 SA for the Schedule of Site Appraisals.</p> <p>The SA utilises a subjective, qualitative scoring system to assess the proposed site allocation against the fifteen objectives. The scoring system is reproduced below:</p> <p>Significance Assessment</p> <p>Description</p> <p>PP (DARK GREEN) The option is likely to have a significant positive effect.</p> <p>P (LIGHT GREEN) The option is likely to have a positive effect which is not significant.</p> <p>? (YELLOW) ? Uncertain – It is uncertain how or if the option impacts on the SA/SEA objective.</p> <p>- (WHITE) Neutral – The option is unlikely to impact on the SA/SEA objective.</p> <p>X (ORANGE) The option is likely to have a negative effect which is not significant.</p> <p>XX (RED) The option is likely to have a significant negative effect.</p> <p>SA Objective</p> <p>CY03 Watling Street Truck Stop</p> <p>SA</p> <p>Rep</p>

1

Biodiversity

The area around the existing truck stop is greenfield land and so there would therefore be loss or damage of some habitats from any expansion. However, there is a requirement to deliver new tree-planting and woodland copse on land to the east of the existing filling station. *The site offers significant opportunity for biodiversity enhancement, particularly on land the east of the access which is not proposed to be developed. The scale of enhancements will depend on the application proposals.*

ORANGE

LIGHT GREEN

2

Water

Development could cause adverse effects on the water quality of the Rive Ver. *As shown on the Masterplan, development would avoid the source protection zone and appropriate mitigation can be provided, in liaison with the Environment Agency.*

YELLOW

- WHITE

3

Flood Risk

Part of the site is in a Flood Risk Zones 2 and 3. New development will need to avoid and mitigate current and potential future increased flood risk.

ORANGE

- WHITE

The Masterplan demonstrates development can avoid and mitigate flood risk.

ORANGE

WHITE

4

Climate Change

No predicted effects.

- YELLOW

- WHITE

5

Air Quality

Increases in localised HGV movements which would result from the development could result in reductions in air quality in the vicinity of the truck stop. *It should be noted that the proposed use does not generate new HGV trips, it services the needs of existing users of the strategic road network. In addition, there will be air quality improvements elsewhere, where the HGVs are currently trying to park. The score should, therefore, be neutral.*

ORANGE

- WHITE

6

Soils

The expansion of the truck stop would take place on greenfield land, resulting in soil sealing. *The development platform will not take the entire site area leaving significant areas for landscape and ecological mitigation.*

ORANGE

ORANGE

7

Resource Efficiency

No predicted effects.

- WHITE

- WHITE

8

Historic Environment

New development could have adverse effects on the setting of the nearby Listed Building (Chequers). *This can be addressed as part of any future*

YELLOW

YELLOW

planning application.

YELLOW

YELLOW

9

Landscape/Townscape

The development would extend the existing truck stop into open countryside. *The proposed development is landscape-led and the Masterplan demonstrates how the site could come forward to minimise impact on the countryside. Specifically, the proposal will also improve the street frontage of Watling Street as part of the comprehensive redevelopment, which will provide a significant improvement to the appearance of the area.*

ORANGE

ORANGE

10

Health and Wellbeing

Increased HGV movements could result in noise disturbance issues for local residents. Improved welfare facilities for commercial drivers would have benefits against the wellbeing objective. *The benefits for drivers are agreed. The Masterplan shows how screening and careful location of development could mitigate noise impacts on nearby residents. Residents affected by the informal parking of HGVs will have less disturbance. The score should, therefore, be neutral.*

YELLOW

- WHITE

11

Sustainable locations

No predicted effects.

- WHITE

- WHITE

12

Community Cohesion

No predicted effects. *This may be true for the immediate area, however, residents and others affected by the informal parking of HGVs will have an improved quality of environment. The score should be changed to positive.*

- WHITE

LIGHT GREEN

13

Housing

No predicted effects.
 - WHITE
 - WHITE
 14
 Sustainable Prosperity
 Expansion of the truck stop should support the local economy. *The safe and efficient operation of the strategic road network is acknowledged to have economic benefits.*
 LIGHT GREEN
 LIGHT GREEN
 15
 Employment and Skills
 Expansion of the truck stop should provide additional employment opportunities. *Agreed.*
 LIGHT GREEN
 LIGHT GREEN
 The comments at 6.7 around mitigation being 'built-in' to the Plan through both strategic and detailed policies is generally supported. As proposals for specific sites evolve further detail will be provided regarding mitigation for specific allocations. This is discussed further in Section 6.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS14863
Person ID	1265016
Full Name	Charles Aylwin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

QUESTION: Sustainability Appraisal comment Too little emphasis on redeveloping Brownfield sites, & too much emphasis on development on green field sites.

Agree with the need for more housing and in particular affordable housing, BUT very concerned with the apparent search for very large developments to fulfill the quota in single shot, rather than intelligent use of smaller sustainable sites with managed impact on the local area.

For example, major development in Tring by the Cemetery with no additional infrastructure (schools, doctors, dentists, childcare/nurseries, drainage) planned. In this specific instance, the housing is being built, but none of the amenities above have had additional capacity added.

Additionally, the site north of the Long Marston Cricket Ground, excluded from the Strategic Plan, but included for consideration in the Local Plan Interim Sustainability Report, Appendix F, would cause a significant increase in flooding in Long Marston and Astrope, both of which already flood regularly.

Additionally, the suggestion that it add to the sustainability of services within Tring is wrong - these are already over stretched, and new services would need to be provided.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS14868
Person ID	1145605
Full Name	
Organisation Details	Premier Property Acquisition
Agent ID	1145599
Agent Full Name	Mr Jonathan Buckwell
Agent Organisation	Director DHA Planning
Yes / No * Yes * No	Yes

**QUESTION: Sustainability
Appraisal comment**

We have reviewed the evidence base that underpins the Council's development strategy for Berkhamsted and wish to make a number of comments in this regard and in particular with reference to our client's site. The Council have allocated 10 greenfield sites at Berkhamsted (BK01, BK03, BK04, BK05, BK06, BK07, BK08, BK09, BK10) which form the focus of our comments.

We have provided a tabulated summary of the Sustainability Appraisal dated November 2020 in respect of the greenfield site allocations at Berkhamsted. It is noted that, just like the proposed site, all the draft allocations identified are located within the Green Belt. As can be seen below sites BK03, BK04, BK05, BK08 and BK10 all score the same or worse than our client's site in terms of sustainability dependent on the category.

BK0 1

BK0 3

BK0 4

BK0 5

BK0 6

BK0 7

BK0 8

BK0 9

Bk10

Proposed site

1. Biodiversity

X &

√

X &

√

X

X

X &

√

X

X

X

X

X

2. Water

?

?

?

?

?

?

?

?

-

?

3. Flood risk

-

?

-

?

-

-

-

X

?

-

4. Climate change

X &

√

X

X

X

X

√

X

√

X

X

5. Air quality

?

X

X

X

X

?

X

?

X

X

6. Soils

X

X

X

X

X

X

X

X

X

X

7. Resource efficiency

?

?

-

?

?

-

?

?

-

-

8. Historic

environment

X

?

X

?

X

?

?

?

?

?

9. Landscape/tow nscape

X

X

X
X
X
X
X
X
X
X

10. Health and well being

X &

√

X &

√

X &

√

X &

√

√

X &

√

X &

√

√

X

X & √

11. Sustainable locations

√

X

X

X

√

√

X

√

X & √

X

12. Community cohesion

√

√

√

√

√

√

√

√

√

√

13. Housing

√

√

√

√

√

√

√

√

√

√

14. Sustainable prosperity

- √
- √
- √
- √
- √
- √
- √
- √
- √
- √
- √
- √

15. Employment and skills

- √
- √
- √
- √
- √
- √
- √
- √
- √
- √
- √

Table: summary of scoring of greenfield sites in the Council's Sustainability Appraisal.

Sustainable location

BK03, BK04, BK05, BK08 and BK10 are scored negatively for sustainable location alongside our client's site. Notwithstanding this an examination of the AECOM Report 'Berkhamsted and Tring Transport Strategy' forming part of

the Council's evidence base for the draft local plan identifies differences between the sites. Our client's site is identified as being within a 15–25-minute travel time by bus to the town centre where as BK05 and Bk08 are located in the 25–40 journey time band. In terms of access time to the town centre by bicycle the proposed site lies within the <10-minute journey time whilst Bk05, BK06 and BK08 all lie within the 10–20-minute travel time zone. In respect of travel time by foot the site lies within the 10–20-minute zone whilst Bk03 lies within the 20 to 30minutes zone and BK05, Bk06 and BK8 within the 30-40 minutes zone. In respect of distance to schools the proposed site lies closer to both a secondary school and primary school combined by comparison to BK05, BK06 and BK8.

It is therefore evident that the proposed site is more sustainably located than BK05, BK06 and BK8.

Included files

Title Question: Sustainability Appraisal

ID EGS14901

Person ID 1144629

Full Name Mrs SOPHIE LAWRANCE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

QUESTION: Sustainability Appraisal comment As explained above, the conclusions of the Interim Sustainability Appraisal Report - which note a number of key concerns around the existing infrastructure - have not been properly reflected in other parts of the Plan.

For example, while the Sustainability Appraisal correctly states: “*any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects [...] relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants*”, 110 many of the proposed development sites are not close to facilities and services or well connected by existing/planned transport infrastructure.

110 Interim Sustainability Appraisal Report, pp.29-30.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS14935
Person ID	1270839
Full Name	EMMA WELLER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would</p> <p>clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>

Included files	
Title	Question: Sustainability Appraisal
ID	EGS15026
Person ID	1270845
Full Name	DOMINIC LAWRENCE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>Identification of / differentiation between sites</p> <p>As a general comment, greater care should be taken when determining what is a site, versus a collection of sites that are contiguous or in close proximity to each other.</p> <p>For example, two separate fields to the south of Northchurch, divided by Bell Lane, have been treated as a single site (Bk06). However, the character of these sites is quite different, and the degree of landscape susceptibility is therefore quite different. One of these fields (the larger of the two) extends high up the side of the valley towards the area of AONB to the south, and there is significant intervisibility with a particularly lovely area of the AONB to the north-east (Northchurch Common / the Ashridge Estate), across the Bulbourne valley. This field has a genuinely rural atmosphere and there is minimal existing development, most of which is well concealed from most parts of the field. The draft "Dacorum Borough Landscape Sensitivity Study" prepared by Arup accurately records that:</p> <p><i>"The high plateau of the [larger] parcel has much less development around it and most views feature the arable field and wooded surroundings with a high degree of separation, tranquillity and scenic quality. The north of the western field has some exposure to the development edge of Berkhamsted, but the level of screening reduces the impact and the area maintains a tranquil setting"</i> (page 64).</p> <p>By contrast, the smaller of the two fields is correctly described as being:</p>

“much more exposed to the development edge of Berkhamsted. The open, undulating agricultural land and long distance views provide good scenic quality, but there is an urbanising affect from the unscreened, short range views of garages and residential streets” (page 64).

Overall, the study concludes that overall, these fields have a moderate-high landscape susceptibility to development, but it is hard to avoid the conclusion that were the two fields to be assessed as separate sites, different ratings would be given. **It is entirely inappropriate to combine parcels of land with such different characteristics, as it can skew the outcome of sensitivity studies.**

Site references

As a further general comment, **greater care should be taken to ensure that a consistent nomenclature is used for the identification of sites that are under review.** For example, the site (in reality, two separate sites, that have been treated as one) Bk06 is labelled as Parcel 18 in the “Dacorum Borough Landscape Sensitivity Study”. This impedes cross-referencing. Arup should have been asked to amend the report to use the same site references as used elsewhere in the draft local plan / evidence base documents.

Included files

Title Question: Sustainability Appraisal

ID EGS15034

Person ID 1270846

Full Name PETER ATKIN

Organisation Details ASSOCIATE

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment	<p>5.0 In respect of the Sustainability Appraisal (SA) process, Taylor Wimpey is generally satisfied with the overall approach taken which concludes that land at Homefield is one of the strongest performing sites in in the village. However, it is considered that site specifics have not been appropriately taken into account, which has resulted in unnecessarily conservative scoring in some areas.</p> <p>5.1 For objective 1 'biodiversity', the SA gives Homefield a negative 'û' scoring. This does not take into account the strong opportunities that exist to deliver a net gain in biodiversity and ecological enhancements given it's current degraded state. The site should therefore receive at least a neutral '?' score for this objective. This scoring would also then be consistent with the biodiversity score for Fox Meadow, which has a similar biodiversity situation but receives an SA score of '?' for this objective.</p> <p>5.2 In terms of objective 9 'landscape', the SA gives the site a negative 'û' score. However, as discussed above, the site is well enclosed with a good level of boundary screening that can be further enhanced and overall sensitivity of the site is assessed by Dacorum to be low given its weak relationship with the wider countryside and degraded character. Furthermore, the proposed provision of open space within the site can be designed through appropriate masterplanning to further successfully mitigate any landscape impact resulting from the development of the site. On this basis, we consider the site should have as a minimum a neutral '?' score and potentially a positive 'ü' score for this objective.</p>
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Included files	
Title	Question: Sustainability Appraisal
ID	EGS15048
Person ID	1250021
Full Name	Hallam Land Management Ltd
Organisation Details	Hallam Land Management Ltd
Agent ID	1265070
Agent Full Name	Stacey Rawlings
Agent Organisation	
Yes / No	
* Yes	
* No	

**QUESTION: Sustainability
Appraisal comment**

Section 12(2a) of the Environmental Assessment of Plans and Programmes Regulations 2004 requires that the Sustainability Appraisal (SA) identifies, describes, and evaluates the likely significant effects of reasonable alternatives. Section 19 of the Act relates to the Preparation of Local Development Documents. Section 19(5) requires that during this process an appraisal of the sustainability of the proposals must be undertaken.

This is confirmed in the PPG (11-001) which states inter alia:

“Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation.” (emphasis added)

Similarly, the final paragraph of the PPG (11-018) identifies that SA is an iterative process, with proposals being revised to take account of appraisal findings. To achieve this, it is necessary to prepare a SA alongside the preparation of Local Plan policies such that these policies can continue to be refined to limit or mitigate adverse effects and maximise benefits, with each such refinement considered in an update of the SA.

As the Reg. 18 document is strategic in nature, it is accompanied by an interim SA/SEA dated November 2020. This builds upon the 2017 SA Working Note that was published alongside the earlier Issues and Options consultation. The latest version is explicit that the SA is limited to how to distribute additional housing in the Green Belt (c5,500 new homes) and not how to distribute all the proposed new housing^[Footnote 2 Section 3.3 of the Interim SA Report – Non Tech Summary – Nov 2020]. It does not cover the c10,900 proposed homes inside settlement boundaries. This is deficient for the following reasons:

Whilst reasonable alternatives to the proposed Green Belt extensions have been considered in different parts of the SA to date, HLM has not been able to identify that any reasonable alternatives to the other policies are being fully identified or evaluated. This includes the absence of any consideration of reasonable alternatives to meeting the affordable housing requirement (of a minimum 35% of new homes) or the effect and wording of development management policies.

The absence of such appraisals cannot be justified as there are reasonable alternatives to the draft proposals that have not yet been considered. For example, a development strategy that achieves a balance of sites that would better respond to local housing need including affordable housing need must be considered to provide a reasonable alternative.

To date, the policies and proposals which are included in the consultation draft Local Plan have not been fully assessed in order to identify the likely effects which would result were the policies to be adopted in a new Local Plan. The Council must include an assessment of the likely delivery of affordable homes from its urban capacity sites in order to establish if an effective strategy can be delivered that meets the needs of all its housing requirements. This should be undertaken as part of its Assessment of whole plan effects for SA Objectives 10 (Health and Wellbeing); 11 (Sustainable Locations); 12 (Communities) and 13 (Housing).

The SA/SEA process should clearly demonstrate the rationale for the sites that feature in the next iteration of the Local Plan. HLM note that the 2020 version includes an updated range of reasonable alternatives for testing purposes. The Council recognises that further work is necessary, and the SA will continue to evolve. The Council's preferred strategy (Option Ci) shows very little difference at the high-level between each of the options considered, particularly in relation to likely significant effects.

The Council applied for and has obtained funding from Central Government to support the work required to develop plans for a new garden community to the north/east edge of Hemel Hempstead town for circa 11,000 new homes by 2050. The town has been awarded Garden Town status in 2019 by Government yet the SA only has a passing reference to Hemel Garden Communities despite it forming an integral part of the Councils preferred strategy for growth and features across several policies. There appears to be a substantial disconnect between the draft plan and the SA.

The fundamental criticism to the methodology is the lack of assessment of potential in-combination effects arising from the wider Hemel Garden Community aspirations and potential allocations in a St Albans Local Plan and/or the emerging Joint Spatial Plan for South-West Hertfordshire. It should take into account potential linked growth. It is currently deficient.

HLM consider the Council will need to review the balance of the development strategy across the borough in light of the updated SA/SEA and other evidence and any comments received during the Reg.18 consultation. There is insufficient evidence published alongside the Reg 18 consultation to properly review and consider whether the Council's approach is properly evidenced and justified. This goes to the heart of both legal compliance and wider soundness considerations.

Of those Green Belt sites considered in the Interim SA, no alternative strategic-scale spatial options have been assessed at Hemel to establish whether there is an alternative strategy that would better meet the aims of Green Belt policy to 2038 as an alternative to Phase 1 of the HGC.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS15107
Person ID	1270925
Full Name	Mrs Kathryn Salway
Organisation Details	Extinction Rebellion Dacorum
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	As stated in the Sustainability Appraisal: "any development that takes place on greenfield sites, including that in areas currently in the Green Belt has the potential for adverse effects relating to habitat loss, increased water consumption, impacts on local landscapes, soil sealing, natural resource use, increased waste, and increased emissions of both greenhouse gases and airborne pollutants"

Many of the proposed development sites are NOT close to facilities and services and are NOT well connected by transport infrastructure.

There is no comprehensive calculation in the plan or the SA on what is affordable in comparison to minimum wage and average wages in Dacorum.

Biodiversity (SA Objective 1)

Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land.

Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.

Flood Risk (SA Objective 3)

SA states it has found 'no predicted effects' against this objective because the level of growth proposed in the Local Plan should be provided without the need to develop in areas of higher flood risk. However, the largest area of development in Tring, between Bulbourne Road and Station road,

floods regularly (please see picture attached in appendix to Q6 answers, taken in January 2021).

Greenhouse gas emissions (SA Objective 4)

The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

Photo to support comments on Flood Risk (SA Objective 3) flooded land between Bulbourne Road and Station Road, in the largest area of proposed development in Tring. Picture taken January 2021.

Air Quality (SA Objective 5)

Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road.

The plan needs to provide a comprehensive data analysis on the negative impact on air quality. The outcome of such analysis should inform a plan which ensures the reduction of air pollution via:

- the selection of development sites which do not encourage car use or increase congestion;
- the creation of a robust electric transport network;
- planning which ensures net zero emissions from new developments; and
- the creation of carbon fixation via rewilding and protection of natural habitats.
-

Landscape & Townscape (SA Objective 9)

The SA and Plan sites an ambition to concentrate most of the development in the Borough's most sustainable settlements to reduce the amount of greenfield land required to deliver growth, thereby reducing levels of adverse effects on local landscapes. The aim is laudable but not carried through in the proposed development of Berkhamsted and Tring, in terms of design and site selection.

Housing (SA Objective 13)

Significant positive effects have been predicted against this objective as the plan requires the provision of 16,595 homes across the plan period. This meets the Borough's Objectively Assessed Need (OAN) and includes a mix of housing tenures, types and sizes of home (a minimum of 35% to be affordable housing), however, 'affordable' needs to be defined and must be based on the income of people working in Dacorum.

The percentage of affordable housing must be higher to solve the problem of the housing shortage for local people. By prioritising the development of truly affordable homes fewer houses will be required overall to solve the housing shortage, and there will be less pressure to build on the greenfield sites.

Included files	XR SA Comments.jpg
Title	Question: Sustainability Appraisal
ID	EGS15122
Person ID	1222814
Full Name	Alex MacGregor
Organisation Details	Senior Planner Quod Ltd (ON BEHALF OF PIGEON INV MAN LTD)
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	Pigeon Hemel Hempstead Ltd considers that, overall, the methodology of the Interim Sustainability Appraisal (SA) appears to be robust. In assessing sites, DBC has sought to maximise the use of brownfield land in urban areas, before looking at releasing land from the Green Belt. The approach to direct growth to urban extensions on existing large settlements, through Green Belt release seems logical and necessary to meet the Local Housing Need in a sustainable manner.

However, Pigeon Hemel Hempstead Ltd consider that DBC could strengthen some parts of the SA. In particular, whilst Pigeon Hemel Hempstead Ltd agree with DBC's decision to reject the idea of a new settlement on land to the north west of the Borough, more could be done to document the unsuitability of this option in the SA. The same can be said of the justification provided for the dismissal of other sites and options, which superficially at least score relatively well against the SA objectives. Lessons learned in adjacent authorities together with the potential new approach advocated in the Planning White Paper suggest that the work will need to be seen to robustly test potential alternatives and very clearly articulate the reasons for the selection of the preferred strategy.

Included files

Title Question: Sustainability Appraisal

ID EGS15139

Person ID 1270940

Full Name

Organisation Details CERDA PLANNING (ON BEHALF OF BOVINGDON PARISH COUNCIL)

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment The Interim Sustainability Report (November 2020) addresses and analyses the six Growth Options that underlie the Spatial Strategy that supports the Emerging LP and, in particular, Option Ci that was finally chosen and upon which the emerging plan is based.

Option Ci envisages growth spread across the six main settlements, and with 'low growth' at the villages, including Bovingdon (for around 190 new dwellings in total). Option Cii, which envisaged growth spread across the six main settlements, however, it would have included 'high growth' at both Bovingdon (for up to 600 dwellings) and also at Kings Langley. BPC had previously provided its objection to such levels of growth as part of the Issues & Options consultation on the basis that, in comparison to the larger settlements within the Borough, even Kings Langley, Bovingdon suffers from a lack of easy access to the main highway network and to public transport services such as rail and frequent bus services, which would have made such major levels of growth highly unsustainable.

BPC is supportive of the conclusions drawn in respect of the chosen Growth Option Ci as stated at paras.5.5.2 and 6.4.14 of the Interim Sustainability Appraisal Report as it relates specifically to Bovingdon. The level of growth (around 190 new dwellings in total across the two allocated sites, a maximum of 150 of which would be at the new allocation at Grange Farm) that is proposed for Bovingdon throughout the Plan period is considered to be a sustainable level of

development which will provide the opportunity to address significant infrastructure issues that the settlement experiences at the present time.

BPC would not envisage or welcome that the proposed level of development for Bovingdon as indicated under Growth Option Ci would be amended upwards as the Emerging LP moves forward towards adoption. If it were to be the case, BPC would not support the loss of any further greenfield (Green Belt) sites around the settlement to accommodate higher levels of growth on the grounds that all other such sites have been assessed as being unsustainable in the drafting of the Emerging LP.

Included files	
Title	Question: Sustainability Appraisal
ID	EGS15158
Person ID	1270945
Full Name	
Organisation Details	NORTHCHURCH PARISH COUNCIL
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>6.1 The Plan is not compatible with the objectives of the Sustainability Appraisal (SA)</p> <p>Dacorum’s Local Plan Interim SA Report November 2020 4.5 (page 24) assesses the compatibility between SA Objectives and Local Plan Objectives. In relation to Local Plan Objective: “Delivering Dacorum’s future with homes for everyone”, it concludes:</p> <p>“This objective is potentially incompatible with a number of the SA objectives:</p> <ul style="list-style-type: none"> • The level of housing development required in the Borough will require development of greenfield land. Development of greenfield land is not compatible with biodiversity (SA1) due to landtake, potential habitat fragmentation and urban pollution issues. Development on greenfield land would also result in soil sealing (SA6). • Providing new homes in the Borough will put direct pressure on water resources (SA2) which are already identified as ‘over-abstracted’. • Housing development will result in increases in greenhouse gas emissions from new housing and associated activities (SA4). It will also contribute to background emissions through an increase in the number of vehicles on

the road thereby reducing air quality (SA5). The objective also has uncertain compatibilities with several the SA objectives:

- Parts of the Borough lie within areas of flood risk and there is the potential for new housing sites to lie within these zones (SA3).
- Housing development on greenfield sites is potentially incompatible with the SA objectives on historic environment (SA8), and landscape / townscape (SA9).”

Similarly, the report details potential incompatibilities between SA objectives and two Local Plan Objectives: ‘Generating a vibrant economy with opportunities for all’, and ‘Enabling the delivery of infrastructure’.

The Local Plan should remove the word “potentially” and acknowledge that Local Plan Objectives are not compatible with sustainability.

The proposed developments contain insufficient social housing to meet local needs. For example, a semi-detached house in the Bearroc 2 site, adjacent to the new Northchurch developments, is priced between £500,000 and £800,000. This is beyond the means of people in Dacorum who need housing.

Included files

Title Question: Sustainability Appraisal

ID EGS15176

Person ID 1270993

Full Name MRS MERRIL TRUEMAN

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn ' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site ' s relationship with the existing physical landscape independently and fails to take into

consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact ; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as " East of Tring " fails to meet the efficient use of land objective and yet this isn ' t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS15186

Person ID 1270998

Full Name PAUL HARRIS

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with

regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites

being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined

as " East of Tring " fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS15197

Person ID 1142578

Full Name Mr Norman Brooks

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within

a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would

clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS15217

Person ID 1264623

Full Name Judy Chaussalet

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

QUESTION: Sustainability Appraisal comment	<p><u>Biodiversity</u>: Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land. Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.</p> <p><u>Greenhouse gas emissions</u>: The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).</p> <p><u>Air Quality</u>: Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road. The plan needs to provide a comprehensive data analysis on the negative impact on air quality</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS15218
Person ID	1271003
Full Name	Thierry Chausalet
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION: Sustainability Appraisal comment	<p><u>Biodiversity</u>: Policies in the Local Plan should concentrate on housing and employment development in urban areas and away from greenfield sites to protect, maintain and enhance designated sites and their buffer zones and reduce the loss of agricultural land which may have biodiversity value. This laudable aim is not followed through in the selection of the proposed development sites in Berkhamsted and Tring, which include greenfield and agricultural land. Net-gain for biodiversity should mean gains through the integration of green infrastructure into the new developments, protection of</p>

natural habitats in the new areas of development and a return of natural ecosystems by rewilding and connection of habitats.

Greenhouse gas emissions: The provision of 16,596 new homes and 116,500 sqm of industrial floorspace requires a detailed plan to reduce GHG emissions. This must contain the relevant data/evidence base and include planning for robust electric public transportation, zero emission construction and absorbing carbon dioxide from the atmosphere by tree planting (fixation).

Air Quality: Transport is a key source of air pollution and so inevitably making provision for 16,596 new homes and 116,500 sqm of industrial floorspace over the Local Plan period will contribute to background emissions through an increase in the number of vehicles on the road. The plan needs to provide a comprehensive data analysis on the negative impact on air quality

Included files

Title Question: Sustainability Appraisal

ID EGS15225

Person ID 1271006

Full Name Ms Zoe Wiggins

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment The Sustainability Appraisal report lists the first 2 key objectives as follows:-

1 To protect, maintain and enhance biodiversity and geodiversity at all

Building 16000 new houses on 850 hectares of green fields, hedges and woods, and settling 50,000 + more people and their cats and dogs into them, can not be done without damaging biodiversity.

1 To protect, maintain and enhance water resources (including water quality and quantity)

DBC's own assessment states that the Gade valley, a Nationally/Globally important chalk stream, is already overextracted. At a high water efficiency level, each person uses about 150 litres of water a day, yet you propose to add 50,000 more people to the area. That's another 7.5 million litres a day - minimum.

Development at the level proposed is simply not compatible with these 2 objectives.

With regards to renewable energy, although it is mentioned that these proposals would be 'positively welcomed', they should instead form part of the local plan in order to provide energy for the excessive amount of extra buildings. Large scale solar and/or wind farms as well as other technologies should be incorporated into the plan.

Included files

Title Question: Sustainability Appraisal

ID EGS15250

Person ID 1271086

Full Name MRS PATRICIA BEL-BARKO

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the

intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined

as " East of Tring" fails to meet the efficient use of land objective and yet this isn' t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS15300

Person ID 1161497

Full Name Mr Robert Sellwood

Organisation Details The Crown Estate

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment The Sustainability Appraisal

The SA supporting the Reg 18 consultation is a sound part of the evidence base. It follows the normal principles of assessing the characteristics of the Borough and establishing a set of SA objectives. It then evaluates the implications of a range of housing development and spatial options to accommodate the selected level of development. This option (and the sites necessary to deliver the option) are then assessed in the context of the SA objectives. Where this process identifies a need for mitigation measures, these are set out.

It is considered that the SA assessment of the North Hemel site (Appendix E, pages E2 to E4) is sound.

Included files

Title Question: Sustainability Appraisal

ID EGS15329

Person ID 1271128

Full Name Little Gaddesden Parish Council c/o Cllr John Saner

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment The proposed development will put pressure on the water supply. The water supply in the Chilterns is fragile and any additional need to pump water from the chalk aquifer will have a deleterious effect on the Rivers Gade and Bulbourne.

The inevitable increase in traffic arising from such large scale development will put huge pressure on already full roads. The proposed new road north of Hemel could have adverse unforeseen consequences on villages to the north and west of Hemel.

Included files

Title Question: Sustainability Appraisal

ID EGS15348

Person ID 1271220

Full Name MAUREEN RUMSEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn ' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site ' s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as " East of Tring " fails to meet the efficient use of land objective and yet this isn ' t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS15357
Person ID	1145662
Full Name	Mrs Catherine Anderson
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn't broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site's relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.</p> <p>Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined</p> <p>as " East of Tring " fails to meet the efficient use of land objective and yet this isn ' t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.</p> <p>Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.</p>
Included files	
Title	Question: Sustainability Appraisal
ID	EGS15385
Person ID	1248890
Full Name	Mr Stuart Oldroyd
Organisation Details	Whiteacre Ltd

Agent ID	1270853
Agent Full Name	Jon Goodall
Agent Organisation	DLP Planning Limited
Yes / No * Yes * No	
QUESTION: Sustainability Appraisal comment	<p>These representations support the overall identification of ‘Option C – Spread Growth across the six main settlements’ as the preferred development scenario. This does involve a distribution of growth. However, ‘Option Ci’ which is selected includes ‘low growth’ at Large Villages’ (Bovingdon = 150), which is now 241 inclusive of other extant commitments and existing allocations .</p> <p>Option Cii, which was assessed, indicated higher growth at Bovingdon (tested at up to 600 units). Overall, the selection of Option Ci is endorsed, contingent on the proposed allocation of land at Grange Farm which supports overall conclusions on the potential for exceptional circumstances to be demonstrated. These representations reserve judgement on the sustainability of Bovingdon to accommodate higher growth. It is apparent from the conclusions of the Council’s Sustainability Appraisal and site assessment process that no other reasonable alternatives perform favourably to the Grange Farm option, nor would other site options achieve the requirements of the Delivery Strategy either in isolation or in combination. Alternative sites could therefore only readily be considered in addition to Grange Farm, rather than as alternatives.</p> <p>An important point to recognise regarding the assessment of strategy options in Bovingdon relates to the fact that in rejecting the ‘higher’ growth option the overall position on benefits of sustainable development to the village cannot be considered to be undermined. This is an important distinction to the settlements of Markyate and Kings Langley and relates direct to the longer-term benefits provided via the Grange Farm site. Appendix C.2 to the Sustainability Appraisal states:</p> <p><i>“The second variation (Option Cii) is to allow a larger scale of growth at Bovingdon and Kings Langley, where such growth could deliver significant new infrastructure such as a new education facilities or avail of high quality public transport links/connections. This variation results in slightly less growth at Berkhamsted and Tring than with Option Ci, but remains significant in scale when compared to Options A and B.”</i></p> <p>In effect, selection of the proposed allocation at Grange Farm delivers substantial benefits including safeguarding land for a new 3FE school. The scale of the potential benefits to be achieved, aside from housing numbers, are equivalent to Option Cii, without the potential for wider adverse impacts.</p> <p>The Council’s reasoning at Section 5.5.2 of the main Sustainability Appraisal Report cites the constraints on Bovingdon as reasons to not select Cii and higher growth. These representations seek to emphasise that the role of the proposed Grange Farm allocation (even as part of an overall lower level of growth) should be specifically recognised in terms of its role in helping to overcome these constraints.</p>

- Whiteacre supports the overall identification of 'Option C – Spread Growth across the six main settlements' as the preferred development scenario. This does involve a distribution of However, 'Option Ci' which is selected includes 'low growth' at Large Villages' (Bovingdon = 150 homes), which is now 241 homes inclusive of other extant commitments and existing allocations.
- The Council's reasoning at Section 5.5.2 of the main Sustainability Appraisal Report cites the constraints on Bovingdon as reasons to not select Cii and higher growth. These representations seek to emphasise that the role of the proposed Grange Farm allocation (even as part of an overall lower level of growth) should be specifically recognised in terms of its role in helping to overcome these constraints.
- In effect, selection of the proposed allocation at Grange Farm delivers substantial benefits including safeguarding 3 hectares of land for a new three form entry (3FE) school. The scale of the potential benefits to be achieved, aside from housing numbers, are equivalent to Option Cii, without the potential for wider adverse impacts.

Included files

Title Question: Sustainability Appraisal

ID EGS15398

Person ID 1271257

Full Name Mr Alastair Hogben

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment

I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn ' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site ' s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as "East of Tring" fails to meet the efficient use of land objective and yet this isn't carried through into the results. Why is this? The Land to the East of Tring (Tr02 and Tr03) is protected under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified. Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS15438

Person ID 1271088

Full Name MIKE WALTERS

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment regard the structure of the scoring system which isn' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site' s relationship with the existing physical

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title	Question: Sustainability Appraisal
ID	EGS15447
Person ID	350823
Full Name	Mrs Sue Yeomans
Organisation Details	Chairman Chilterns Countryside Group
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<ul style="list-style-type: none"> The LP sets out sustainability objectives 1-15 (Appraisal of Sustainability p6) for development within the Borough. The CCG finds the LP failing to meet its own objectives for points 1-11 and questions whether points 12-15 are. Therefore, the CCG believes the LP fails to meet any sustainability objective for the future well-being of the Borough and its residents. In addition to the points identified previously, the CCG remains highly concerned that for all options water supplies and disposal of waste water is assessed as unsustainable (4.2) and further, that present water supplies are already '<i>over-abstracted</i>'. Clearly demand on both fresh water and disposal of waste effluents will increase significantly as more dwellings are built and as the LP identifies: '<i>risk of periodic water shortages increases</i>'. Indeed, the actual building process will place greater demand on water supplies. We find the Sustainability Assessment inadequate in its assessment of the negative impact upon the character and resources of the market towns of Tring & Berkhamsted, where '<i>neighbourhood</i>' developments of considerable size, relative to the existing settlements, are. For example, Tring would experience growth of 55% which would destroy its character and much of the natural green landscape and high quality farmland around its present developed boundaries.
Included files	
Title	Question: Sustainability Appraisal
ID	EGS15467
Person ID	1271103

Full Name	GRAHAM RITCHIE
Organisation Details	FAIRFAX STRATEGIC LAND (HEMEL) LTD
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	SEE ATTACHED RESP
Included files	
Title	Question: Sustainability Appraisal
ID	EGS15485
Person ID	1271381
Full Name	Alison Walker
Organisation Details	Associate Director of Strategic/Large Projects Thakeham Homes
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<ul style="list-style-type: none"> The Emerging Local Plan is supported by an Interim Sustainability Appraisal (SA) Report which includes a site assessment of fifteen sites in Berkhamsted against the Council's 15 SA objectives. As stated above, of these fifteen sites, thirteen were proposed for The proposed allocations are located in four key areas:

A growth area at South Berkhamsted (Policy SP21) comprises six major urban extensions:

- Bk01 Land south of Berkhamsted: 850 dwellings
- Bk02 British Film Institute: 90 dwellings
- Bk03 Haslam Playing Fields: 150 dwellings
- Bk04 Land between Hanburys and A41: 70 dwellings
- Bk09 Bank Mill Lane: 50 dwellings
- Bk10 Hanburys: 40 dwellings

The West Berkhamsted Growth Area (Policy SP22) comprises three major urban extensions

- Bk05 Land adjacent to Blegberry Gardens: 80 dwellings
- Bk06 Land East of Darrs Lane: 200 dwellings
- Bk08 Land at Rossway Farm (Between Shootersway and A41): 200 dwellings

A single urban extension at Bk07 Lock Field, Northchurch: 60 dwellings Three sites within the Urban Area

- Bk11 Billet Lane (Jewson site): 40 dwellings
- Bk12 Berkhamsted Civic Centre and Land to the rear of High Street: 16 dwellings
- Bk13 Gossoms End / Billet Lane: 30 dwellings.

- The two Berkhamsted sites that were assessed through the Sustainability Appraisal but are not proposed for allocation are Land east of Berkhamsted (our client's site) and Ivy House
- Turley has reviewed the draft allocation policies within Emerging Local Plan and the supporting evidence, in particular the SA, and has identified a series of irregularities in

the appraisal. **Appendix 1** sets out our review of the SA for proposed strategic allocations Bk01-09 plus Land East of Berkshamsted.

- The SA assessments of proposed strategic allocations Bk10-13 have not been reviewed because site Bk10 Hanburys already benefits from an allocation (LA4) in the Adopted Development Plan and sites Bk11-13 are situated within the urban area of Berkhamsted, so therefore these allocations are not comparable to the proposed greenfield allocations

Analysis of SA Scores for Land east of Berkhamsted, compared to Proposed Allocation Sites

- Table 5-5 of the Interim Sustainability Appraisal provides a summary of the scoring for each of the fifteen sites considered in Berkhamsted against each of the fifteen SA This is reproduced below.(attached)
- Several of the sites score the same as each other for a wide range of the SA objectives. All of the major urban extension sites have been scored negative effects "x" on the Landscape / Townscape SA objective, however this does not represent the variation between the sites on landscape. Nearly all sites are assigned positive effects in relation to the objective for Housing, Sustainable Prosperity and Employment and Skills. While we appreciate the SA objectives are applicable to the overall strategy and the whole plan, the lack of differential scoring between sites makes it hard to justify the allocation of certain sites over

1.2 Furthermore, where the effects on the SA objective are uncertain "?", (as is the case for many of sites in relation to Water, Resource Efficiency and Historic Environment), the SA is ineffective in assisting with site selection. For example, the objective relating to water scores uncertain effects for nearly all sites across Berkhamsted.

- Below we have considered how our client's site, Land east of Berkhamsted, scores in comparison to the ten major urban extensions that have been proposed for allocation through the Dacorum Emerging Strategy for Growth. In many cases, Land east of Berkhamsted scores either more favourably or equally as well as sites which have been proposed for allocation. It only scores worse, based on the Council's assessment, than proposed allocation sites in relation to the Landscape / Townscape objective, which is discussed further

1.4 Against the following objectives, Land east of Berkhamsted scores equally to the majority of the proposed greenfield allocations, and in some cases slightly better than the proposed allocations:

- **Water** – All sites score uncertain effects. The SA does not take account of Source Protection Zones. Land east of Berkhamsted is principally outside of the SPZ, while proposed allocations Bk02, Bk03, Bk04, Bk05, Bk06, Bk08 and Bk10 are all located within a
- **Flood risk** – All greenfield sites score either neutral or uncertain effects except Bk09 Bank Mill Lane which is adjacent to the
- **Soils** – All sites score negative effects, except for Bk02 British Film Institute, which is previously developed land. The Council has accepted it is unable to meet its housing requirements on previously developed land and as such the principle of the loss of greenfield land has already been
- **Resource Efficiency** – All sites score either neutral or uncertain effects, with uncertain effects being attributed to Land east of Berkhamsted and seven other sites because they lie a within Minerals Safeguarding
- **Historic Environment** – All sites score uncertain effects, except for Bk01 South of Berkhamsted and Bk06 Land east of Darrs Lane which score negative effects
- **Health and Wellbeing** – All sites score mixed positive and negative effects except for Bk09 Bank Mill Lane because of its proximity to the town centre, and Bk06 Land east of Darrs Lane. We explain in **Appendix 1** why we think Bk06 Land east of Darrs Lane should score mixed positive and negative effects and why Land east of Berkhamsted should score significant positive effects for its contribution to health and wellbeing due its ability to provide significant sports pitches and
- **Community Cohesion** – All sites score positive effects, although in **Appendix 1** we set out why only Bk01 South of Berkhamsted should score positive effects and Land east of Berkhamsted should score significant positive effects, owing to the opportunity to provide significant sports pitches and facility provision on the eastern part of the
- **Sustainable Prosperity** – All sites score positive effects, except for Bk02 British Film Institute which will result in the relocation of some employment.

- **Employment and Skills** – All sites score positive effects, except for Bk02 British Film Institute which will result in the relocation of some
- Land east of Berkhamsted scores more favourably than a number of the proposed allocations against the following objectives:
- **Biodiversity** – Many of the proposed allocations score negative effects, however four sites score mixed positive effects, including Land east of Berkhamsted, due to the opportunities to provide a SANG to mitigate recreational impacts on Chilterns Beechwoods SAC. We have in fact queried the attribution of positive effects at two of these sites (see **Appendix 1**) and consider that only Bk01 South of Berkhamsted and Land east of Berkhamsted should score positively in relation to the biodiversity
- **Climate Change** – The majority of sites score negative effects against this objective, however positive effects are identified for Bk07 Lock Field and Bk09 Bank Mill Lane and mixed positive and negative effects are identified for Bk01 South of Berkhamsted and Land east of Berkhamsted. Given that the our client, as the housebuilder who will deliver the development at Land east of Berkhamsted is committed to achieving zero-carbon homes on-site by 2025 (well ahead of national government targets and UN targets) and is the only housebuilder in the UK and only one of five construction companies in the world to be signed up to the SME Climate Hub, and be part of the United Nations’ Race To Zero campaign, we would suggest that Land east of Berkhamsted provides a better opportunity to produce significant positive effects on climate change than any of the
- **Air Quality** – The majority of the sites score negative effects, whereas Land east of Berkhamsted, Bk01 South of Berkhamsted, Bk07 Lock Field and Bk09 Bank Mill Lane score uncertain effects. We have raised concerns about how the effects of the options are assessed against this objective and we would suggest that any site which does not provide any on-site facilities or public transport improvements is likely to result in significant negative effects, whereas sites which would provide a local centre, schools, sport facilities and sustainable transport options are more likely to result in positive effects. As Land east of Berkhamsted can provide a direct link to the A41 (which would also benefit proposed allocation Bk01 South of Berkhamsted), it would reduce traffic travelling through Berkhamsted, in direct contrast to sites to the west of
- **Sustainable Location** – This is perhaps one of the most relevant SA objectives in influencing the site allocation process, yet five of the proposed greenfield allocations score negative effects, while Land east of Berkhamsted will result in positive effects. The SA recognises that many of the sites that make up the South and West Berkhamsted growth areas are not in sustainable locations. (Bk02 British Film Institute, Bk03 Haslam Playing

Fields, Bk04 Land between Hanburys and A41, Bk05 Land adjacent to Blegberry Gardens and Bk08 Land at Rossway Farm).

- **Housing** – While all sites score positively for their contribution to this objective, Land east of Berkhamsted and Bk01 South of Berkhamsted are of a strategic scale that will result in significant positive
- Land east of Berkhamsted only scores less favourably than the other proposed allocations against the following objective:
- **Landscape/Townscape** – The SA identifies that the site will result in significant negative effects, as opposed to negative effects for all other greenfield sites. We contend that this is not an accurate reflection of the effects based on evidence as discussed
- The AONB wraps around the west and north of Berkhamsted. Our client's site is located outside of the AONB, to the south-east of Berkhamsted. The AONB runs to the north of the railway line, meaning that the closest part of the site to the AONB boundary is in fact the area proposed for a country park, with only small parcels to the west of the site and adjacent to the proposed allocation Bk09 Bank Mill Lane proposed for development. It is unclear why sites to the west of Berkhamsted, which are much closer to the AONB boundary and therefore more likely to have an effect on the AONB, have been scored more favourably with regard to landscape than our client's
- Alongside these representations and in support of Land of east of Berkhamsted, we have supplied evidence¹ to demonstrate that the potential for the Land east of Berkhamsted site to affect the expected high quality experiences and characteristics of the Chilterns AONB is limited to a very localised view and equally limited receptors. The landscape experienced within the view does not contain any of the special qualities associated with the AONB and is not considered an outstanding or high quality view. It is not within an area identified as highly representative of the AONB and overlooks an ordinary rural landscape and the existing urban settlement of
- Whilst the proposals will extend the influence of built form within the mid ground, they have been considered to break up massing through retaining the views of the ridgeline, locating open space to break up parcels and ensuring a well treed setting that mirrors the muted existing settlement at Berkhamsted. Therefore it is considered that the proposed development, whilst there will be an increase in urban form within the view, will not significantly detract from the enjoyment and expectations of the current

- The SA includes a summary of Dacorum Borough Council’s reasoning for not including the site in the Draft Local Plan:

“The site suffers from a number of constraints, principally relating to Green Belt and landscape sensitivities including the potential for development to impact the setting of the Chilterns. Development of the whole of the site would erode the important open gap separating Berkhamsted with Bourne End village and with Hemel Hempstead.

Officers considered a smaller scale of growth which would reduce the impact on a number of these issues, however additional evidence has concluded that landscape sensitivity remains high. In reviewing proposed mitigation measures for the site, officers

1 DLA Reports

are not confident that a smaller scale of development will result in a less than significant impact on the immediate and wider landscape including the setting of the Chilterns AONB. Officers have given serious consideration to the sustainability merits of the site, including the potential to deliver significant new infrastructure such as new education provision, a new community hub, public open space, potential new sports/leisure facilities and a new link road linking London Road with the A416 (via site 2: South of Berkhamsted). Currently officers do not consider the merits of the site outweigh the impact that development would have on landscape, particularly the setting of the CAONB and in terms of the impact development would have on the role and function of the Green Belt in this location, eroding the gap between the settlements of Berkhamsted and Hemel Hempstead; both of which would be significant. On balance, officers consider there are more appropriate sites elsewhere which can deliver the strategy and which will not give rise to such significant impacts.”

- All of the greenfield sites considered around Berkhamsted are located within the Green Belt, so it is unclear why the Green Belt is stated right upfront as a reason for not allocating Land east of Furthermore, the Council has described the Green Belt as a “constraint” when in fact it is a policy designation, and therefore not a reason for rejection, and it is not engaged by any of the criteria within the SEA regulations. The review of Green Belt land (a separate evidence study) should not be used to overlook the outcomes of the SA for sites that could be deemed ‘reasonable alternatives’
- The most sustainable locations for development may include a small number of sites that perform more strongly against the purposes of Green Belt, but which when reviewed against all SA objectives would, on balance, be suitable for allocation in order to help meet the housing needs of the

- Davies Landscape Architects (DLA) has provided landscape evidence which includes a strategy that has informed the vision for the Land at east Berkhamsted and ensures the overall impact of the development on the AONB is mitigated. It is not proposed to develop the whole site, and DLA Green Belt Technical Note demonstrates how the proposal will not weaken the gap between Berkhamsted and Hemel Hempstead. The proposed development would provide a contained extension within a well-defined new threshold and defensible boundary to Berkhamsted, and remain spatially and visually separated from Hemel Hempstead.
- Based on our revised scoring for the sites assessed at Appendix One, it is considered that Table 5.5 of the Sustainability Appraisal (provided above) should be amended to reflect the below (attached)

Included files

[Thakeham homes - Alison Walker - Agent Turley - Consultation_Appendix 1 extracted.pdf](#)
[Thakeham Homes - Alison Walker - Table 5.5 SA Extracted.pdf](#)

Title

Question: Sustainability Appraisal

ID

EGS15509

Person ID

400475

Full Name

Mr Michael Demidecki

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment

Table 4.1 Key sustainability issues and Opportunities (page 16)
 Biodiversity, including fauna and flora, and geodiversity.
 Account should be taken of the National Pollinator Strategy 2014 to 2024. Implementation (NPS, to be found at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/301462/nps-2014-2024-implementation.pdf#=The%20National%20Pollinator%20Strategy%20sets%20out%20the%20evidence%20and%20measures%20to%20improve%20the%20state%20of%20our%20bees%20and%20other%20pollinating%20insects%20and%20how%20they%20are%20monitoring%20progress%20and%20the%20need%20for%20more%20and%20better%20habitat%20and%20this%20is%20what%20the%20Justice%20and%20Peace%20Group%20are%20trying%20to%20achieve%20with%20other%20organisations%20and%20individuals%20in%20Tring%20One%20of%20the%20actions%20set%20out%20in%20the%20NPS%20is%20to%20develop%20plans%20for%20a%20network%20of%20wildflower%20recovery%20areas%20to%20provide%20opportunities%20for%20conserving%20pollinators%20as%20outlined%20in%20the%2025%20Year%20Environment%20Plan%20page%2010%20of%20the%20NPS%20There%20is%20an%20opportunity%20to%20provide%20this%20for%20Tring%20in%20the%20Local%20Plan &text=Added%20a%20link%20to%20the%20evidence%20statements%20and%20summary%20of%20evidence). This sets out what the Government will be doing to improve the state of our bees and other pollinating insects and how they are monitoring progress. There is a need for more and better habitat and this is what the Justice and Peace Group, Tring are trying to achieve with other organisation and individuals in Tring. One of the Actions set out in the NPS is to develop plans for a network of ‘wildflower recovery areas’ to provide opportunities for conserving pollinators, as outlined in the 25 Year Environment Plan (page 10 of the NPS). There is an opportunity to provide this for Tring in the Local Plan.

Historic Environment (page 18)

A small area of archaeological significance lies within Tr03m in the area south of Marshcroft Lane. It is understood to comprise 'an enclosure of probable iron Age or Roman date that has been identified from cropmarks visible on aerial photographs.' (page 27 of Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017). I would like to see an investigation of this important archaeological area before further consideration is given to development of this site.

Included files

Title Question: Sustainability Appraisal

ID EGS15561

Person ID 1264530

Full Name BRENDA AND ROY HURLEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* **Yes**
* **No**

QUESTION: Sustainability Appraisal comment I have a specific concern in relation to the Assessment method used for the sustainability appraisal, insofar as it is able to appropriately assess environmental impact. The Assessment relies on a commentary and narrative approach within a Site Assessment Table, due to a lack of specificity with regard the structure of the scoring system which isn' t broken down beyond opinion raised against headings. This is an issue as when assessing individual sites; the assessment has brought forward an assessed position only with regard to that site' s relationship with the existing physical landscape independently and fails to take into consideration any cumulative impact of multiple sites being built upon. This is a particular issue for the assessment with regard to Tring, given that the intended allocation strategy seeks to allocate a wide-spread number of individual sites which would clearly, create cumulative effects upon the wider locality that fails to be sufficiently addressed or measured within the Assessment.

Therefore, in summary the assessment within the scoring system does not consider cumulative impact; that which would be expected to be assessed within applications wherein an Environmental Impact Assessment is required. On a site-specific basis, there is recognition that the land defined as " East of Tring" fails to meet the efficient use of land objective and yet this isn' t carried through into the results. Why is this? The land to the East of Tring (Tr02 and Tr03) is protected

under Green Belt designation and is highly sensitive due to its contribution to Green Belt openness, its interrelationship with the Area of Outstanding Natural Beauty and its agricultural and ecological contribution to the wider area. Any incursion into this space will cause irreversible and substantial harm that cannot be reversed or mitigated for and for which development has not been justified.

Nothing raised within the Sustainability Appraisal identifies that this assertion is incorrect and clearly identifies harm that has failed to be acknowledged within the approach to allocation.

Included files

Title Question: Sustainability Appraisal

ID EGS15574

Person ID 1271579

Full Name

Organisation Details BOYER PLANNING ON BEHALF OF W LAMB LTD

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability Appraisal comment *Sustainability Appraisal*

- The DBC Site Assessment Topic Paper pro-forma also incorporates the findings from the Interim Sustainability Appraisal Report (November 2020). Given the availability of site specific technical information, the Interim Sustainability Appraisal pro-forma contained in the Appendices, has been re-viewed as set out
- The site has been assessed in relation to a number of categories relating to the sustainability of the site. The analysis of the site uses the same traffic light system as used in the Council’s Interim Sustainability Appraisal, with green meaning the option is likely to have a significant positive effect, red when the option will be likely to have a significant negative effect and a range of shades of light green, yellow, white and amber in
- The revised Sustainability Appraisal (SA) draws on technical information from previous submissions, including the Shendish Manor promotion submitted in February 2019 (**Appendix 4**) and the Transport Appraisal Update Note (**Appendix 5**) and an Air Quality Technical Notes (**Appendix 6**) appended to these
- The analysis of Land at Shendish is summarised

Biodiversity

- The site has an Orange rating for Biodiversity as DBC's SA states that the development would result in the loss of greenfield land and areas of woodland which have some biodiversity
- As per the Ecological Appraisal which was submitted as part of the February 2019 promotion, beyond the normal requirements to avoid impacts on protected species and maintain key elements of the habitat resource of the site, there is no overriding nature conservation constraints that would preclude the proposed allocation of the proposed area. There are no habitats of International, National, Regional or County nature conservation importance within the site itself. The existing areas of highest ecological value within the proposed development area will be retained, enhanced and protected as part of the
- Therefore the rating should be reduced from Orange to Light

Water

- The site has a Yellow rating for Water as it states that local upgrades to the network may be required to manage additional capacity for water and
- The Utilities and Drainage Assessment contained in **Appendix 4** provides an assessment in relation to the water and wastewater. Some reinforcement work would be required, however the relevant statutory undertakers have not indicated that new pumping station would be

Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

Flood Risk

- The site has a White rating for Flood Risk as it is unlikely to have an impact as the site is not in Flood Zones 2 and
- As per the Drainage and Utilities Assessment submitted as part of the March 2019 promotion, the design of the proposed scheme includes features to reduce flood and pollution risks and to promote sustainable drainage practice. This is therefore not a constraint on housing development on Land at

Climate Change

- The site has a Light Green rating for Climate Change. DBC's SA states that the site is close to Apsley local centre and has good access to public transport which could decrease the need to travel by car and reduce the level of

growth in greenhouse gas emissions. The development would also be large enough for district heating opportunities to be

- We consider that the site has excellent access to public transport, given that it is only a 5 minute walk from the centre of the site to Apsley train station and bus services on London Road, as well as services diverted into the
- The site provides opportunities for renewable energy production, the effective disposal of waste, the sustainable design of new development and careful land management. Combining this with sustainable design and construction, and sustainable urban drainage systems, it is clear that this site could provide a significant positive effect on climate change and therefore the rating should be Dark

Air Quality

- The site has a Light Green and Orange rating for Air Quality. DBC's SA states that the site is close to Apsley local centre and has good access to public transport which could decrease the need to travel by car and reduce growth in airborne
- The assessment goes on to state that development at this location could increase congestion on London Road with associated implications for local air quality. An Air Quality Management Area (AQMA) was designated in 2011 for part of London Road near to Apsley local centre and additional traffic created by the development at Shendish is likely to add to existing
- The Air Quality Technical Note set out in **Appendix 6** confirms that based on the results of a dispersion modelling assessment, potential impacts on annual mean NO₂ concentrations associated with vehicle emissions from the development are predicted to slight at one position and negligible at 14 positions. As such the impacts are not significant according to IAQM criteria. The assessment also confirms that it is highly unlikely future occupiers will be exposed to levels of NO₂ above limit values; and that the proposals will include mitigation measures suitable for the size and nature of the
- The rating for this site is therefore Dark

Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

Soils

- The site has an Orange rating for Soils. DBC's SA states that the site is greenfield and development would result in soil
- The northern part of the site is currently in use as a golf course (which would be reconfigured) while the southern area is in an agricultural use. However, the Agricultural Land Classification map highlights the site as being Grade 3 Good to Moderate and is not considered to be a constraint to development. Soil protection measures will be used

to mitigate the effects of development such as the reuse of top soil landscaping. Therefore the rating should be Dark

Resource efficiency

- The DBC SA indicates that the site is located within the Brick Clay Mineral Safeguarding Area with implications for safeguarding mineral
- The area adjacent to the railway line is unlikely to be suitable for extraction due to health and safety and land stability issues. It is unlikely that it would be commercially viable to extract from the remaining site area and given the heritage sensitivities of the wider Shendish Manor parkland landscape, mineral extraction is not considered to be constraint to development. Therefore the rating should be Dark

Historic Environment

- The site has a Yellow rating in relation to Historic Environment. DBC's SA states development may affect the setting of the nearby Shendish Manor Locally Listed Park and Garden and a number of nearby Grade II Listed Buildings. It also states that the site is partly within an Area of Archaeological Significance and may contain heritage assets of archaeological interest.
- As per the Heritage Desk-Based Assessment submitted as part of the February 2019 promotion in **Appendix 4**, no buried archaeological remains have been recorded within the Site and there is no specific potential for significant remains to occur within the site. However there is potential for the presence of some buried archaeological remains to occur. The site lies within an area of archaeological potential, to the west of an Archaeological Alert
- The site lies approximately 300m to the east of the Grade II Listed Shendish House and an associated locally registered park and garden. The Heritage Desk-Based Assessment states that the proposed development will not alter any of the important parts of the setting of the Grade II Listed Shendish House that contribute to the asset's significance. It is considered that the proposed development will alter the setting of the locally registered park and garden, to a limited degree, through the loss of part of its wider parkland setting. This harm can be mitigated by a retention of historic tree clumps within the site and through strengthening the tree belt within the site that defines the historic approach towards the gardens and

Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

- Any development coming forwards on Land at Shendish, could provide a suitable separation buffer to the heritage assets and be designed to ensure no adverse impacts on the setting of the Listed Buildings. However, given the sensitivities of the wider historic landscape the rating remains

Landscape/Townscape

- The site has an Orange rating in relation to Landscape/Townscape. DBC's SA states that development at this location would extend Hemel Hempstead into the countryside and reduce the gap between Hemel Hempstead and Rucklers Lane. Development of the site would have a visual impact on the landscape of the Gade Valley, although the retention of the golf course would help to reduce these effects. The Sustainability Appraisal also states that there would be an impact on the parkland setting of Shendish
- The Preliminary Landscape Appraisal submitted as part of the February 2019 promotion (set out in **Appendix 4**) surveyed the wider Shendish Manor site and concludes that there are 8 Landscape Character Sub-Areas. The areas proposed for allocation are within the Shendish Manor Golf Course (East), Land off Ruckler's Lane and Fairfields Sub-Areas. The overall scores of these areas ranges from high to
- However while the wider landscape including Shendish Manor, its parkland setting and golf course has a higher landscape value, the area identified for development is in the lower lying portion of the site and reflects the part of the site that has been assessed as having the lowest potential landscape sensitivity.
- Given the sensitivity, the rating remains

Health and Wellbeing

- The site has a Yellow rating in relation to Health and Wellbeing. DBC's SA states that the site is close to the railway line which could result in noise levels affecting health and well- It also states that the site's location close to local amenities could encourage active travel, though access to the public right of way paths that cross the site may be affected by the development.
- The proposed site allocation is mainly exposed to sound from rail traffic on the Westcoast Mainline railway and the initial site risk assessment contained in the Noise and Vibration Assessment in **Appendix 4**, shows the site to be low to medium risk and appropriate mitigation can be
- Furthermore, the development will provide with a number of footpaths and access to open space which will allow for the health and wellbeing of future communities. This rating should therefore be reduced to Light

Sustainable Locations

- The site has a Light Green rating in relation to Sustainable Locations. DBC's SA states that the site is close to Aspley railway station and is within a reasonable distance of facilities and This is therefore not a constraint on housing development at Shendish Manor.
- The site is an exceptionally accessible location and provides many opportunities for sustainable travel. The site is located within a 5 minute walking distance of Apsley Station from the centre of the site (400m) and a wide range of everyday facilities and services Residents will have excellent opportunities to travel on foot or by bicycle to access these facilities instead of using a car. Development at this site in relation to this objective will have a positive effect. This rating should therefore be Dark Green.

Community Cohesion

- The site has a Light Green rating in relation to Community Cohesion. DBC's SA states that a site of this scale has the potential to contribute to community facilities including a new local centre and primary schools with the possibility for a secondary school. This is therefore not a constraint on housing development at Shendish Manor.
- The proposals make provision for a site for a 2FE primary school with pre-school nursery and associated playing fields, a 160 unit care village, a community hub with village hall (potentially utilising the existing barn at Fairfields), a station plaza with café, newsagent and live work The scheme will also deliver recreational facilities and children's play areas.
- The rating should therefore be Dark

Housing

- The DBC SA has a Dark Green rating in relation to Housing as development of the site would provide c.550 dwellings which would provide a significant positive effect. This is therefore not a constraint on housing development on Land at
- The site has been assessed for 500 dwellings or 439 dwellings and a 160 unit care

Sustainable Prosperity

- The site has a Light Green rating in relation to Sustainable Prosperity. DBC's SA states that new housing should help to support the local services in the town, maintaining their viability and boosting the local economy. Development

will therefore allow sustainable levels of prosperity and economic growth and this is therefore not a constraint on housing development at

Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

Employment and Skills

- The site has a Yellow rating in relation to Employment and Skills due to a lack of certainty about job losses associated with the golf course. The development proposes to retain and reconfigure the golf course and therefore no negative effects will be felt with regards to this Furthermore, Shendish Manor is well located for employment opportunities, with opportunities in Apsley, Hemel Hempstead, Watford and London which are all easily accessible from the site via sustainable transport modes, such as the train from Apsley station.
- Therefore the site performs well in relation to Employment and Skills and the rating should therefore be light

Comparison Sustainability Appraisal Assessment

- The Table below summarises DBC's ratings and Boyer's suggested ratings based on a review of the assessments and evidence base, and mitigation that can be provided if development were to come forwards on the

Topic

DBC Rating

Boyer Rating

Biodiversity

Water

Flood Risk

Climate Change

Air Quality

Soils

Resource Efficiency

Historic Environment

Landscape / Townscape

Health and Wellbeing

Sustainable Locations

Community Cohesion

Housing

Sustainable Prosperity

Employment and Skills

Summary

- The summary at the end of the DBC Interim SA site assessment highlights that the site performs well but Officers remained concerned about safe access over the railway line or onto Rucklers Lane. Both matters are addressed in the Transport Appraisal Update Note (**Appendix 5**) which overcomes these issues. Concerns were also raised regarding the impact on the local and strategic network with associated air quality issues. These matters are also addressed in the Transport Appraisal Update Note and the Air Quality Technical Note (**Appendix 6**). As these matters have been resolved and the site performs very well in the revised SA, the site is considered suitable for inclusion in the Draft Plan.

Included files

Title Question: Sustainability Appraisal

ID EGS15615

Person ID 1271748

Full Name Ms Gosia Turczyn

Organisation Details Wigginton Parish Clerk
Wigginton Parish Council

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<p>It is proposed to use Green Belt land at Dunsley Farm, Tring (7.4 hectares) for employment as well as housing. This site is surrounded by the AONB which would be harmed by such development. The AECOM study, which is the basis for the inclusion of this site, makes reference to the Ridgeway National Trail being on a scarp of the AONB but fails to take into account the significance of this important and sensitive section of the AONB. This National Trail passes over Ivinghoe Beacon and Pitstone Hill both of which provide extensive views from the AONB that will be spoilt by what will be seen as a blot on the landscape. This is therefore clearly a site that should never have been put forward and ought to be withdrawn, especially following the very recent change in Government policy including the statement mentioned previously "We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places"</p> <p>The Dunsley Farm allocation together with the other large Tring allocations will inevitably put additional pressure on Tring station. The plan recognises that additional parking provision will need to be made but this is not seen as a problem. However, the fact that Tring Station is within the AONB seems to have been overlooked by AECOM in their assessment for Dacorum.</p> <p>The AECOM assessment carried out for Dacorum states that there is "No risk of coalescence with other settlements" a reference to a primary reason for the Green Belt which in this case means preventing Tring from merging with Berkhamsted but has direct implications for Wigginton. As Tring and Wigginton are less than 1 km apart there is a longer term risk of coalescence as the land at Dunsley Farm extends as far as the Wigginton village envelope. Should the proposed Dunsley Farm site go ahead, it would leave this remaining farmland somewhat isolated and could lead to the need for replacement agricultural buildings etc. and perhaps a replacement farmhouse.</p> <p>Furthermore Hertfordshire County Council, who own Dunsley Farm have previously promoted for housing the farmland stretching from the A41 all the way up to Wigginton. It was included in the 2008 Site Allocations as 01h23 and 01h24 but not subsequently taken forward.</p> <p>The recent change in Government policy together with the poor performance of the 3 large Tring allocations in terms of harm to the Green Belt and more particularly to a particularly sensitive part of the Chilterns AONB would make it appropriate to remove all three from the current plan. If after a more thorough site search no better alternative sites could be identified, then a more detailed assessment of these rejected sites should be included in the plan submission so that the Inspector can make the decision whether to include them or not. An Inquiry Inspector is unlikely to go against recent Government policy " We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places"</p>
Included files	

Title	Question: Sustainability Appraisal
ID	EGS15633
Person ID	1271974
Full Name	EMILY FORD
Organisation Details	SENIOR PLANNER
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Sustainability Appraisal comment	<ul style="list-style-type: none"> The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) requires that an environmental assessment of plans and programmes, including Local Plans is carried out. The regulations require identification, description and evaluation of the likely significant effects on the environment of implementing the plan and of reasonable alternatives taking into account the objectives and the geographical scope of the plan (Article 12(2)). In addition, an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including difficulties encountered in compiling the required information is required (by Schedule 2 of the Regulations). Paragraph 32 of the NPPF states that local plans should be informed throughout their preparation by a sustainability appraisal (SA) that meets the relevant legal This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered). <p><u>Methodology</u></p>

- It is noted that the Interim SA report published as part of the current consultation follows consultation on the SA Scoping report in March 2017 and SA Working Notes in relation to the Issues and Options Plan and Site Appraisals in November. The staged approach to consultation, in line with SEA Regulations, is supported.
- The methodology used by RTP, appointed by DBC to prepare the SA, is also considered to be broadly in line with SEA Regulations and Planning Practice Guidance and is therefore supported. Our comments on the application of the methodology, focusing on the assessment of spatial strategy options and sites is provided below.

SA Framework Objectives

- Croudace broadly support the SA framework objectives identified within Table 4-2 of the Interim SA. The objectives are considered appropriate for the Borough, consistent with the Local Plan objectives and in combination should enable the Plan to realise sustainable development.

Identification and Assessment of Reasonable Alternatives

- We note that the SA reports prepared to date present the findings of assessment of reasonable alternatives as well as reasons for selecting/rejecting. This is supported; however, it is recommended that further detail explicitly justifying the selection/rejection of reasonable alternatives is provided within the final SA report to be prepared alongside the Regulation 19 stage Local Plan to provide clarity on how the Plan has been prepared and options considered throughout its preparation. In addition, it is

recommended that commentary in relation to options rejected at an early stage is included in the final SA so that justification for all rejected options can be found within one report.

- Turning to the options assessed, it is noted that three different levels of housing growth were originally considered within the 2017 SA (602dpa, 756dpa and 1000-1100dpa) alongside three spatial strategies for distributing growth ('Focus on three towns', 'Hemel Hempstead focus' and 'Spread more evenly across the Borough'). Further assessment of options is more recently included within the Interim SA report, specifically:

- Option A - Focus growth on the 3 main towns (Hemel Hempstead, Berkhamsted and Tring), based on 922dpa
- Option B - Focus growth on Hemel Hempstead, based on 922dpa
 - Option C (i & ii) - Spread growth across the six main settlements, based on 922dpa
 - Option Ci: Spread across the six main settlements (low growth at villages)
- o Option Cii: Spread across the six main settlements (high growth at Bovington and Kings Langley)
- Option D (i & ii) - New settlement alongside growth at the 3 main towns, based on 922dpa
 - Option Di: New settlement in the north-west of Borough
 - Option Dii: New settlement at Bovington airfield
 - Option E - Higher growth option, based on 1100dpa

- We note that the delivery of c. 10,900 new homes inside settlement boundaries (on sites assessed as part of the Urban Capacity Study) is consistent to all options tested within the Interim SA

- We welcome the assessment of a broad range of options within the SA as well as the commentary provided in relation to further options rejected due to not being considered reasonable

- We broadly support the findings of the assessment of housing requirement and spatial strategy options, recognising that the high level assessment results in greater uncertainty about the likelihood of some. In particular, we strongly support the conclusions that a housing requirement below the standard method would not be appropriate for the Plan (Table 5-2) and that it is more sustainable to focus the majority of growth in the three main towns within the Borough (section 5.3.3.2 and Table 5-3). These are key factors which should inform the final Local Plan as we discuss further below.

- In the context of the above, we support the selection of Option Ci (growth spread across the six main settlements with low growth at villages) as the spatial strategy to be pursued by the

- Whilst the work done to date is welcomed, assessment of further reasonable alternatives is considered necessary, for example to test an alternative housing requirement figure following publication of the revised local housing need figure for Dacorum (1,023 dpa) as a result of recent updates to the Standard Method by the Government in December 2020 and revised spatial strategies which may result from

- Positively, Croudace recognise Option E equates to a quantum of development broadly in line with the revised standard method figure and as such there is existing evidence to demonstrate that higher growth will result in an

increased positive effect on SA Objective 13 (Housing) compared to the current preferred scenario and broadly comparable effects on the other wider SA. However, there may be a need for further examination and exploration of spatial strategy options taking account of the revised housing need figure. We discuss the implications of the revised housing need figure for the Borough further below.

- In respect of the assessment of sites within the SA, we consider that this has been undertaken in a manner broadly in line with Planning Practice
- We comment upon the assessment of proposed site allocation Bk08: Rossway Farm (the Site) in Section 7 of these

Included files

Title Question: Sustainability Appraisal

ID EGS15715

Person ID 1273151

Full Name Ms Megan Green

Organisation Details Senior Planner
Thakeham Homes Ltd

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Sustainability Appraisal comment The Site has been assessed in the supporting evidence to the ‘Dacorum Local Plan (2020 - 2038) Emerging Strategy for Growth’ consultation.

A summary of the Council’s assessment of the Site is displayed in the table below (source: Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Interim Sustainability Appraisal Report – Appendices (November 2020);

Fox Meadow, Bovingdon

Biodiversity

?

Water

?

Flood Risk

-

Climate Change

√

Air Quality

√

Soils

**

Resource Efficiency

?

Historic Environment

-

Landscape/ Townscape

X

Health and Wellbeing

√

Sustainable Locations

√

Community Cohesion

√

Housing

√

Sustainable Prosperity

√

Employment and Skills

√

Thakeham notes that some of the criteria has either not been fully assessed or has been incorrectly assessed. In the below points, Thakeham provides additional information in relation to Biodiversity, Water and Resource Efficiency as a result of the Council's '?' grading to allow the Council to fully assess the Site:

- **Biodiversity** – Thakeham is committed to delivering at least a 10% Net Biodiversity Gain on all of its development sites, working closely with charities such as The Wildlife Trust, in order to achieve these. Therefore, the assessment should score the site as
- **Water** – Thakeham has committed as part of its published Sustainability Strategy that all sites will have targets to protect the resilience of the green and blue infrastructure for future. Thakeham is committed to designing and building water efficient developments and homes by mitigating flood risk through the installation of Sustainable urban Drainage Systems (SuDS) in a way that enhances biodiversity and protects water resources by minimising water consumption during the construction phase. Beyond this, Thakeham is researching water neutrality and is seeking to reduce the demand for potable water, by investigating rainwater harvesting at a development- scale as part of a system towards water neutrality with the aim to mitigate future water stresses and support resilience. Based on the above, the assessment should score the Site as
- **Resource Efficiency** - Thakeham has also committed as part of its published Sustainability Strategy to move all materials and systems towards a circular

Thakeham is committed to eliminating the impact of the production of homes through targeting carbon emissions, Modern Methods of Construction, waste, and water and is developing a Responsible Procurement Policy which promotes products with the lowest social and environmental impact. Thakeham has committed to be carbon neutral in production from 2025, which includes the process of material selection, transport, construction, and disposal. This will be achieved through a variety of ways including through making informed product choices, reducing waste and transportation, stakeholder engagement to improve the availability of sustainable resources, and investments in renewable energy. Any construction waste diverted from landfill through reuse off-site, recovery, and recycling will be measure, with the target being a 100% landfill diversion rate. Therefore, the assessment should score the site as .

Thakeham disagrees with the Council's assessment of the Site against the criteria 'Soils' and 'Landscape/Townscape' criteria and has provided an alternative assessment below.

As shown by page 43 of the Interim Sustainability Appraisal Report Appendices, the Site has been assessed as "red" against the soils criteria on the basis the Site is identified as 'Grade 2' on the Natural England Agricultural Land Classification map Eastern Region (ALC008) dated 2010. Thakeham raises concern with the evidence used by the

Council to assess all the sites against the criteria, as the map does not go into sufficient detail. This is accepted by Natural England as when downloading the map from the Natural England website, the following is stated 'These maps are not sufficiently accurate for use in assessment of individual fields or sites and any enlargement could be misleading. The maps show Grades 1-5, but Grade 3 is not subdivided.'

Thakeham is of the view that in order for each site to be assessed sufficiently, a desk-based study and field survey is required to assess the factors that affect each site – for instance, climate: temperature and rainfall, aspect, exposure and frost risk, site: gradient, micro-relief and flood risk and soil: texture, structure, depth and stoniness, chemical properties. Only after an appropriate study has been taken place can the sites really be given an accurate agricultural land classification.

Thakeham would also like to highlight that the map is not displayed at a suitable scale for assessing individual sites. As shown by the extract below, Thakeham is of the view that the Site appears to be coloured Green 'Grade 3' but even if the Land at Fox Meadow is considered Grade 2 Agricultural Land this should also apply to the adjacent site 'Land at Homefield', where this is assessed as in same assessment rather than .

Extract - Natural England Agricultural Land Classification map Eastern Region (ALC008) dated 2010.

Whilst the Council has not provided sufficient evidence to assess a site's agricultural land classification, even if the land was assessed to be of Grade 2 quality, the loss of land at the Site would not significantly harm national, regional or local agricultural interests and it would not result in the fragmentation of any agricultural holdings that would undermine the economic viability of the remaining holding. The Site is adjacent to the existing settlement and other land, further from existing settlements, would have far greater agricultural use as part of a wider network of connected, undeveloped land. The Site is no longer suitable for agricultural use and due to its location, the Site is a better and more sustainable location for housing development and community uses such as the scout hall and playing fields.

As noted in the Council's Stage 2 Green Belt Study (dated December 2016), the site forms part of a larger parcel (Parcels BV-A5) which is considered to make a weak contribution to the purposes of the Green Belt (page. 71). The Site is visually well contained with strong defensible boundaries.

As stated in AECOM's Site Assessment Study (dated January 2020) instructed by the Council as part of its evidence gathering, no Landscape/Townscape issues are identified with the Site (Fox Meadow) *"The site is not within the Chilterns AONB and would be unlikely to impact the setting of the Chilterns AONB due to distance and intervening features. The*

site is within LCA 107 of the DLCA; the condition of the LCA is described as moderate, and the strength of character is described as moderate. The site is on flat ground and comprises a single field of pasture. The site adjoins residential land uses in Bovingdon to the north-west and is enclosed by mature tree belts to its north-east and south-east. Overall, the site is judged to perform well on this criterion.” Page 42.

The same report does raise concern with the southern-most parcel as it could represent “*an extension of the existing settlement into open countryside*”. Thakeham would like to draw the Council’s attention to the amended masterplan submitted within the Vision Document, in which the southernmost parcel incorporates a junior football pitch and single storey community scout hut and associated parking. Thakeham is of the view that this proposal respects the report’s concerns.

Site Comparison to Proposed Allocations

A summary of the Council’s assessment of the Site compared to the proposed site allocations is displayed in the table below;

Fox Meadow, Bovingdon

Grange Farm

Chesham Road/

Molyneaux Avenue

Biodiversity

?

X

X

Water

?

?

?

Flood Risk

-

?

-

Climate Change

√

√

√

Air Quality

√

√

√

Soils

**

**

X

Resource Efficiency

?

?

?

Historic Environment

-

?

-

Landscape/ Townscape

X

X

X

Health and Wellbeing

- √
- √
- √

Sustainable Locations

- √
- √
- √

Community Cohesion

- √
- √
- X

Housing

- √
- √
- √

Sustainable Prosperity

- √
- √
- √

Employment and Skills

- √
- √
- √

A comparison between the Site and the proposed allocations against the assessment criteria is detailed below.

Biodiversity

As outlined in the Sustainability Appraisal, the proposed site allocations are either adjacent a Local Wildlife Site (Grange Farm) or within “a high value local biodiversity wildlife corridor” (Chesham Road and Molyneaux Avenue – page 277). The Site is located in a less-sensitive biodiversity area and will deliver biodiversity enhancements on site and should therefore be

marked

Water

Thakeham has committed to working towards water neutrality. Based on these commitments, the Site should be marked

Flood Risk

Unlike the two proposed allocations in Bovingdon, the Site is not at risk of surface water flooding. Given the extent of surface water flood risk of the proposed site allocations as set out in the Council’s own evidence base, Thakeham is of the view the other sites should be marked . As the Site is

in Flood Zone 1 with no surface water flooding risk, it should be marked

Soils

Grange Farm and the Site have been assessed as “” against the soils criteria on the basis that both sites have been identified as ‘Grade 2’ on Natural England’s map. Thakeham raises concern with the evidence used to assess the sites, as the map does not go into sufficient detail and that other factors as outlined above need to be considered.

Due to the size of the Site and its proximity to existing an residential area and the village centre, even if the land was assessed to be of Grade 2 quality, the loss of land at the Site would not significantly harm national, regional or local agricultural interests. Based on the above, Thakeham is of the view that the Site should be marked .

Due to the size of the Grange Farm site this would lead to a larger scale loss of potentially higher grade agricultural land and as it is both a larger piece of land and further from the existing village centre of Bovingdon, it be a greater loss of agricultural land. Therefore, Thakeham is of the view that

Grange Farm should remain

Resource Efficiency

As referred to above Thakeham has publicly committed to reducing construction waste, working towards a circular economy. Based on

Thakeham's commitments, the Site should be marked

Historic Environment

Given the scale of the proposed development at Grange Farm and that there is a Grade II Listed Building (White Hart Cottage) in close proximity to its north-west boundary, Grange Farm should be assessed as 'poor' as its development will have an impact on the setting of the Listed Buildings. Given the evidence above regarding archaeological risk on Chesham Road/Molyneux Avenue, the site should also be marked 'poor' based on its proximity to the historic Bovingdon Airfield and risk of archaeological

remains (prehistoric and Roman) being on-site.

Landscape/ Townscape

Whilst Thakeham notes all sites are in the Green Belt, the Site has been assessed to make a weak contribution to the purposes of the Green Belt and is visually well contained with strong defensible boundaries. The Site adjoins residential land uses in Bovingdon to the north-west and is enclosed by mature tree belts to its north-east and south-east. Given the sensitivities of the Green Belt designation, Thakeham is of the view the Site's assessment should remain 'poor' but is of the view that Grange Farm would lead to a significant encroachment into the Green Belt and wider countryside and should therefore be marked 'poor'.

Health and Wellbeing

The Site is the only site allocation that would deliver tangible health and wellbeing benefits in the short term (given the uncertainty regarding the deliverability of a new primary school at Grange Farm). The Site will provide community space to enable clubs and classes as well as a new football pitch which will benefit the health and wellbeing of the wider village. Thakeham is of the view that as Chesham Road/Molyneux Avenue does not provide any facilities, it should be marked 'poor'.

Sustainable Locations

Whilst all three sites have been assessed the same, Thakeham would like to raise that Grange Farm is located the furthest from the village centre of Bovingdon in the least sustainable location of the site options and therefore is likely to have a higher reliance on travel by private car and generate considerable traffic movements. Thakeham would also point out that the Council's own assessment of Chesham Road/ Molyneux Avenue in the Sustainability Appraisal states the busy road may pose an accident risk and discourage people from walking into the village. On that basis, Thakeham is of the view that Grange Farm and Chesham Road/ Molyneux Avenue

should be marked

Community Cohesion

As Grange Farm is only delivering land for a primary school opposed to a new school, the site should be assessed as as land only will not deliver any community benefit during the Plan period. Thakeham's site, with its new community facilities and improved links to adjacent sports facilities is the only site out of the three that facilitates community cohesion.

Thakeham has demonstrated in these representations that the proposed allocations do not provide as many community benefits as the Land at Fox Meadow. Following the proposed amendments above, Thakeham is of the view the Council's assessment of the sites should be as follows;

Fox Meadow, Bovingdon

Grange Farm

Chesham Road/

Molyneaux Avenue

Biodiversity

√

X

X

Water

√

?

?

Flood Risk

√

X

X

Climate Change

√

√

√

Air Quality

√

√

√

Soils

X

xx

X

Resource Efficiency

√

?

?

Historic Environment

-

X

X

Landscape/ Townscape

X

xx

X

Health and Wellbeing

√

√

X

Sustainable Locations

√

X

X

Community Cohesion

√

X

X

Housing

√

√

√

Sustainable Prosperity

√

√

√

Employment and Skills

√

√

√

General Planning Policies within the draft Local Plan

Thakeham would also like to take this opportunity to comment on the Council's Guiding Development policies within the draft Local Plan. Thakeham has commented below on the following policies;

- Policy SP7 – Delivering Infrastructure
- Policy SP10 - Climate Change Mitigation and Adaptation
- Policy DM2 – Affordable Housing

- Policy DM8 – Custom and Self Build Housing
- Policy DM10 – Accessible and Adaptable Homes
- Policy DM23 - Energy and Carbon Emissions Reductions in New Development
- Policy DM22 – Sustainable Design and Construction
- Policy DM36 – Tree Retention and Protection
- Policy DM41 – Height of Buildings

Included files [Thakeham Homes - Megan Green - Fox Meadow Bovington Written Representations. Feb 2021_Redacted.pdf](#)

Title Question: Sustainability Appraisal

ID EGS15772

Person ID 1271978

Full Name JOANNA HARLEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Sustainability **Water availability Appendix C17**

Appraisal comment

The comment reflects the concerns residents have about the aquifer and abstraction, set out in stark terms:

“Context: In 2014/15 the household water use in Dacorum was estimated to be 151.97 litres per head per day which was one of the highest within the county compared to other districts.

Groundwater resources are now at or approaching full utilisation, and many rivers and streams including the Bulbourne, Gade and Ver suffer from unfavourable flow conditions due to climate change causing heavy rainfall and long dry spells which detrimentally impacts upon water quality and creates pressure on underground drainage systems. The Chilterns Chalk Streams are particularly susceptible to over abstraction and urban pollution. The Catchment Abstraction Management Strategy (CAMS) for the Colne catchment (Environment Agency, December 2007) identified that the underlying chalk aquifer is assessed as being ‘over-abstracted’.

In terms of waste water treatment capacity the Study identified that the main outcomes from the evaluation of need for Dacorum were as follows: “Any development within the Upper Gade catchment by 2031, northwest of Hemel Hempstead, could significantly impact water quality and require sensitive planning; The indicative development areas around

Berkhamsted are likely to require strategic intervention from 2031 onwards to accommodate the scale of projected growth within the Berkhamsted STW catchment; The evaluation indicates a large degree of uncertainty in 2051, with the high scenario demonstrating strategic intervention could be required across the district (mainly to improve STW capacity). This scale of intervention could require adoption of local planning policies and / or construction methods to limit foul flows and promote large-scale water recycling; and Focusing growth proposals on Hemel Hempstead could provide a greater number of unrestricted opportunities, utilising the capacity of the existing system and relieving pressure on Berkhamsted”.

Option E (1,100dpa)

x

Providing 1,100 dpa would put additional pressure on water resources when compared to the housing levels proposed under Options A-D. As for those other options, this level of growth could cause issues with potable water supply, with the effect being likely to become even more acute over time as more dwellings are build and the risk of periodic water shortages increases.”

This is a strong indicator about the need to plan for a key infrastructure requirement: the 2031 horizon is barely mid-way through the Draft Plan period. It will not be enough to rely on assumptions that utility providers will deliver under their statutory obligations.

Landscape C27

“Option D requires development of a new settlement in one of two potential locations which would alter the landscape of a part of the borough, in a manner that would be irreversible. The significance of the effects will be dependent on layout and design, including how the settlement is intergrated into the existing landscape. Significance will also depend on how the new settlements would affect the setting of the Chilterns AONB.”

While the term ‘irreversible’ is explicitly recognised for this Option [large scale release of Green Belt], this and the adverse impact on AONB is only implied where loss of Green Belt is proposed for other Sites.

“Context: Hertfordshire’s Traffic and Transport Data Report 2018 identifies that traffic within the Borough is forecast to increase by 6% by 2021 from 2017 levels and by 17.4% by 2031.

Mainline rail is a good travel option for Dacorum, with access to four stations: Apsley, Berkhamsted, Hemel Hempstead and Tring. There is also a station in Kings Langley that, although it falls outside of the administrative area of Dacorum, serves existing communities in the area.

There is also a good level of bus services in Hemel Hempstead where the network is generally well developed and an adequate level of service in other locations. Markyate is an exception where bus transport is considered unreliable and poorly intergrated with other larger local towns in the borough. A key issue that has been identified is that bus services are not adequately linked between Hemel Hempstead rail station, Maylands and Hemel Hempstead town centre.

A high frequency bus service (no.500) links the settlements of Tring, Berkhamsted, Hemel Hempstead and Kings Langley with other major settlements, including Watford and Aylesbury.”

We comment above:

The bus route 500 operates as a commercial service by Arriva at a frequency of 3 buses per hour on Monday-Friday, 2 buses per hour on Saturdays and 1 bus per hour on Sunday shopping hours. There is no evening service or early service on Saturdays. Due to its length, it also suffers from reliability issues. Despite fulfilling the criteria of a “good public transport service” in the Topic papers, there is a paucity of services in other directions from Berkhamsted. We do not agree that a sustainable transport network is in place in Berkhamsted.

The following abstracts from the site assessments show a common theme –

- the distance from the town centre,
- the gradient serving to discourage walking or cycling,
- absence of alternative public

Also their proximity to the A41 - its ambient and peak noise levels may have an adverse effect on Health and Wellbeing to residents unless effective mitigation measures are adopted.

The Attachment with this reply suggests that transport routes should be defined from the outset to encourage residents to use public transport in preference to private vehicles.

SEE ATTACHED FOR TABLES

E44

E46

Included files

[STAT - Berkhamsted Town Council - Draft Local Plan_BTC response_vfinalB.pdf](#)

26 Evidence Base responses

Title	Question: Evidence Base
ID	EGS98
Person ID	1255447
Full Name	Andrew Sparrow
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS110
Person ID	1254846
Full Name	James Martin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	There is no up to date transport plan to back this emerging plan up therefore the evidence base is not complete and invalidates the emerging plan.
Included files	
Title	Question: Evidence Base
ID	EGS153
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	GENERAL COMMENT: There are nearly 130 documents under this heading it would take a month of Sundays to read, let alone take in all the information. Randomly selecting some files I have found files having between 69 up to 131 pages, with a quick calculation on averages that would mean going through a approximately 13,000 pages. That's about 5 times larger than the Brexit agreement. I feel that a ref in the previous sections, to the specific files would help people get a better understanding of this section of the document. So I cannot say whether the information is relevant or not
Included files	
Title	Question: Evidence Base
ID	EGS202
Person ID	1257823
Full Name	Thomas Ritchie
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
QUESTION: Evidence Base comment	For example, it does not provide acceptable reasoning for the site decisions made in Berkhamsted. The Traffic Plan identifies some of the problems but offers no solutions (because there are no real solutions to the existing geography and road layouts)
Included files	
Title	Question: Evidence Base
ID	EGS266
Person ID	1207707
Full Name	Mike Beavington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS330
Person ID	1259852
Full Name	Imogen Wagstaff
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
QUESTION: Evidence Base comment	This plan seems to be based on out of date data such as 2014 ONS household projections and a water scoping study produced in 2010. It also does not account for the effects of the ongoing pandemic, the repercussions of which in terms of economic and social wellbeing and climate impacts are likely to be great and the plan will need to be updated and amended once the extent of these are fully known.
Included files	
Title	Question: Evidence Base
ID	EGS442
Person ID	1260485
Full Name	Nick Bowles
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
QUESTION: Evidence Base comment	You are ignoring evidence that does not fit your desire to build. You are basing your plans for the type of development on outmoded ideas of the way that people lived 20 years ago and certainly not since the start of this century. a thriving town centre is no longer a valued space, but local shopping, hospitality and recreational facilities are. Access to the countryside has proven increasingly popular - to the extent that local farmers are complaining about too many walkers - yet you plan to remove countryside and massively increase the numbers of people accessing the remaining fragments. This isn't simply an issue because of the extra housing planned in DBC but also the extra housing in many villages (Aston Clinton, Halton) and towns (Princes Risborough) within 5 miles of the DBC boundary.
Included files	
Title	Question: Evidence Base
ID	EGS495
Person ID	1258240
Full Name	Adele Giles

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS574
Person ID	1261023
Full Name	Richard Brash
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	For reasons already stated elsewhere in this submission, we believe the assumptions on which the proposals are based are flawed
Included files	
Title	Question: Evidence Base
ID	EGS646
Person ID	1261183
Full Name	Oliver Fairfull
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS664
Person ID	1261122
Full Name	Mark Slade
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Appears to take no account of the fundamental change in regional housing needs that will be precipitated by the COVID pandemic. Less commuting, more working from regions, less congregation of people in the same place. Development like this is solving problems of the past, not the future.
Included files	
Title	Question: Evidence Base
ID	EGS765
Person ID	1261250
Full Name	Christina Thompson
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Strategies need to be reviewed following the coronavirus pandemic. I have found no evidence for the need to extend Tring to the extent that is proposed.
Included files	
Title	Question: Evidence Base
ID	EGS814
Person ID	1261352
Full Name	MR JAMES GROUT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	See my comments in question 5 (Tring Proposals & Sites) .
Included files	
Title	Question: Evidence Base
ID	EGS821
Person ID	863317
Full Name	Mr John Allan
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS831
Person ID	1260562
Full Name	DAVID WILDE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Dont know. The documents are so extensive the general public cannot be expected to read all of
Included files	
Title	Question: Evidence Base
ID	EGS854
Person ID	1259318
Full Name	Anna Ashwell
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS909
Person ID	926372
Full Name	Mr Michael Nidd
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Much of the evidence base is an out-of-date set of consultants' reports and though reference to CoVid appears, these reports and any conclusions drawn from them take no account of the fundamental shifts caused by the CoVid epidemic: e.g, high levels of working from home rather than travelling to an office; many fewer visits to shops etc., all of which have reduced demand for commercial and office property.
Included files	
Title	Question: Evidence Base
ID	EGS952
Person ID	1205804
Full Name	Mrs B. Watson
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	Unfortunately due to the Covid-19 pandemic I think that some of the planning needs and demands may have changed. For instance with employment the demand for office space or retail may have changed as more people may work from home permanently. Also I think the density of housing should be reduced with less high rise buildings and more green space.
Included files	
Title	Question: Evidence Base
ID	EGS1083
Person ID	1261687
Full Name	Caroline Grout
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	Not up to date or adequate for current times!
Included files	
Title	Question: Evidence Base
ID	EGS1178
Person ID	1143779
Full Name	Ms Julia Marshall
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS1250
Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The Evidence Base is either inadequate in several areas, not fully up to date, or presents significant data that are not explicitly addressed in the Local Plan.</p> <p>Topic Papers. Chilterns Beechwood SAC Summary and Appendices 1 to 26 https://www.dacorum.gov.uk/docs/default-source/strategic-planning/topic-paper-for-the-chilterns-beechwoods-sac-summary-of-evidence.pdf?sfvrsn=d9da0c9e_4</p> <ul style="list-style-type: none"> Extensive evidence is presented about the significant importance of SSSIs and other protected areas. More than any other town in Dacorum, Tring is surrounded by SSSIs and other important wild spaces (5 out of 9 Dacorum SSSIs border Tring with a sixth just outside in Buckinghamshire). However, in the Local Plan special attention is given only to the Ashridge portion of the Beechwood SAC.

- Appendices 25 and 26 are provided by the Woodland Trust. The significance of this land (which actually contains three SSSIs and not the one implied in the overarching document) and the impact of proposed developments are not reflected in the LP. There is also no consideration given to the adjoining woodland in Buckinghamshire.

Topic Papers. Site Selection section 2.20

- Where it has been concluded that land is required to be released from the Green Belt, the NPPF makes clear that compensatory improvements must be made to the environmental quality and accessibility of remaining Green Belt land.
- There is NO explicit reference to how this will be achieved in the Local Plan.

Included files

Title	Question: Evidence Base
ID	EGS1285
Person ID	1145427
Full Name	Mr David Glenister
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	Growth predictions by ONS have reduced between 2014 and 2018; one might surmise that Brexit and an international pandemic will have reduced growth rates further. Indeed, the birth rate has been falling steadily since 2012 when it peaked at 1.93 (2.1 is required to maintain a steady population) and is now down to 1.60 in England, and even lower in Scotland. This doesn't necessarily mean the population is falling, because older people are living longer, but if you factor in a Brexit brain drain which has already started, the return home of many EU nationals (also already started) and the Government's policies on immigration, then one might possibly anticipate that we will follow the trend in Spain, Germany, Japan etc. where populations are falling. This may not fit in with Governments 'build, build, build' message to the public, but DBC have a responsibility to the Borough and its residents, both current and future, to build the right homes in the right places. The first step in that is exploring what constitutes the true need of the Borough and the true ability to fulfil that need within the constraints of the Borough, including Green Belt as dictated by the NPPF. This surely needs to be

carried out prior to determining the required number of residential property units as part of the growth plan . In addition, DBC have not considered the effects of the current pandemic within their evidence base for this local plan.

I would have expected that the evidence base is absolutely the right place for DBC to challenge the Government numbers and the methodology and this does not seem to have been undertaken as part of this Local Plan.

Included files	
Title	Question: Evidence Base
ID	EGS1344
Person ID	1145350
Full Name	Mr Edward Murray
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	Sorry, the evidence base does not adequately take account of: - population decline within UK (brexit related) - covid impact on high street (vacant empty properties)
Included files	
Title	Question: Evidence Base
ID	EGS1365
Person ID	1262046
Full Name	Mr Richard Abraham
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS1379
Person ID	1262050
Full Name	Mr Martin Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS1419
Person ID	1262068
Full Name	Ms Emma Starnowska-Reed
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>DBC are using an outdated Air Quality Action Plan from 2014-2018. Air quality has not improved since then, and recently, significantly, air pollution has been legally listed as a cause of death.</p> <p>The transport study takes <i>no</i> account of Berkhamsted's geography and <u>valley</u> setting. Most building is proposed along the top of the valley.</p> <p>No significant proposals for improvements to roads or traffic flow. All additional traffic created will feed on to Shootersway, Kings Road to town/station, and various rat-runs to avoid inevitable congestion.</p> <p>DBC is relying on outdated data, from a study in 2011 – which showed potential problems with water supply / drainage. It's not clear what impact the development proposals will have on this, as well as sewage – especially with a greater number of housing suggested.</p> <p>No proposals have been made to improve walking/cycling/public transport routes.</p>
Included files	
Title	Question: Evidence Base
ID	EGS1524
Person ID	1262216
Full Name	George Godar
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	We do not believe that the target of c. 17,000 new houses in Dacorum is supported by the evidence having regard to latest ONS figures and previous Dacorum BC projections.
Included files	
Title	Question: Evidence Base

ID	EGS1536
Person ID	217987
Full Name	Mr Chris Watson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	Unfortunately due to the Covid-19 pandemic I think that some of the planning needs and demands may have changed. For instance with employment the demand for office space or retail may have changed as more people may work from home permanently.
Included files	
Title	Question: Evidence Base
ID	EGS1537
Person ID	217987
Full Name	Mr Chris Watson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	Also I think that housing will require more space for home working and there will be a greater demand for private gardens so that people can get outside while isolating.
Included files	
Title	Question: Evidence Base

ID	EGS1595
Person ID	1149465
Full Name	David Reavell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	New housing demand data should be used.
Included files	
Title	Question: Evidence Base
ID	EGS1609
Person ID	1261385
Full Name	stephen hearn
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>Growth area TR06 – off Brook Street Tring</p> <p>TR06 comprises Tring Market Auctions, The Tring Local History Museum, the Fire Station and Forge Car Park.</p> <p>Tring Market Auctions is located at the rear of the site of TR06 with access from Brook Street and a license to access the Forge Car Park.</p>

The ownership of the site is divided between Tring Town Council (Auction Rooms, Museum and the Market Place *hardstanding area*), Dacorum Borough Council (Forge Car Park) and Herts County Council (The Fire Station). The Freehold ownerships make it a somewhat complicated issue should planning proceed.

In the proposal, no mention has been made for Tring Market Auctions to be included in the future plans of TR06, but mention has been made that if the site is re-developed Tring Market Auctions would be offered an alternative site in the town – where? The Auctions currently comprise about 16000 sq ft of buildings alone together with the adjoining parking areas. No detail has been provided and no mention of re-location provisions has been made. It appears the proposals are an afterthought to the Dacorum local plan. Tring Market Auctions occupy under the terms of a lease with Tring Town Council.

The History and Current use of the Site

In 1893 under the requirements of the Board of Agriculture and with the assistance of Lord Rothschild, the sale room with office was constructed in Brook Street. It was let to W Brown & Co. who conducted the first sale by auction in January 1894, since when auctions and sales have been held continually on the site for over 125 years – surely this qualifies the location to be part of Tring's heritage.

During recent years from 1960 there has been numerous enquiries and planning applications to develop the site with offices and supermarkets together with residential, all of which have been rejected.

In 1993 the livestock auction ceased to operate leaving the chattel auction business to continue and flourish under the directorship of Stephen Hearn who took Tring Market Auctions to become independent and grow into the fine company it is today.

It now has an extensive complex of four Auction Rooms, forming one of the largest and best known venues of its type in the Home Counties.

The sales attract a very large number of vendors and buyers from Tring and the surrounding towns and villages together with an ever-growing number of people from throughout the Home Counties and Internationally. Many of the buyers represent the trade and other specialist collectors in all categories.

The auctions provide a friendly and entertaining atmosphere on sale days making it an enjoyable venue for both business and pleasure. Regularly around 500 visitors attend on viewing and sale days, many of these attending the auction visit the town shops and local attractions.

Tring Market Auctions is a unique and key component of the town's economic town centre fabric. It provides a key fulcrum for maintaining the town centre economic sustainability. Visitors to the auctions provide business for other local shops and enterprises not just on sale days but across all the sites activities, its town centre location is fundamentally linked to many other local business and the town market continued sustainability.

The auction rooms provide a unique component part of maintaining Tring Town Centres' viability and supporting Tring based economic development. If Tring is expected to grow then business, jobs and economic infrastructure growth needs to be matched, Tring Market Auctions needs to be maintained as it supports this economic ambition of the Local Plan

through continued town centre provision of a business that is complementary to local shops and does not provide competition, as would the proposed supermarket.

The Saleroom operates with a permanent staff of some 20 people which includes consultants and additional part time staff during sale days. The venue is a key local employer, bringing training and development and job opportunities for local young people.

The Auction sales deal with all periods of furnishings and collectables, processing over 50,000 lots each year providing an effective and affordable house furnishing option for many local people. It has a growing importance as a recycling centre, particularly when it is estimated over 20 tonnes of furniture timber is recycled every fortnight, which supports the climate ambitions in the Local Plan.

In addition the Auction provides a key income stream to the Town Council reducing precept impact on local residents and contributing to a sustainable model of local government

The Auction provides a service to both the local community and professional organisations throughout the Home Counties and beyond.

Points of Consideration

- It is positioned on a site with a long history of auctions and marketing of stock
- It is an important asset for the Town
- The auction attracts a large number of visitors to Tring throughout the year
- It employs local townspeople
- Town Centres should reflect the distinctive characteristics of a Market Town
- The site would not lend itself as a supermarket, particularly when this proposal is unproven
- The Auction Rooms occupy a strategic position at the head of an open space and wildlife corridor which runs from the Tring Park Mansion vista through to Icknield It is very much part of the local community, supporting many of the Town's organisations and groups

Planning Matters for Consideration

- Brook Street has a notorious reputation for being dangerous in parts where it is very narrow making it often difficult for vehicles to pass
- Tring High Street has introduced traffic calming measures
- It is suggested in the development plan that a supermarket would be served with a new carpark. Bearing in mind the development would include the existing Forge Car Park, does one interpret this as denying the town parking facilities
- Recently, two large planning applications have been refused in Brook Street both in close proximity to TR06, one being the residential re-development of Market Garage and the introduction of a residential development on the North Eastern side of Silk Mill works. In both instances, the reason for refusal included over-development of the respective sites and the dangers of access to Brook Street
- The plan proposals to create new food and drink leisure uses is difficult to understand when there are currently so many retail outlets available in Tring

- It states that any re-development of the site would only be permitted once replacement facilities are provided elsewhere in the town. The only specified new location is in Growth Area TR01 (Dunsley Farm) for the Fire and Rescue There is no detail with regard to the siting of Tring Market Auctions, nor the Local History Museum.
- One can create new buildings but one cannot create history

TR06 is not a redundant site, it forms and important part of Tring Town Centre with Tring Market Auctions and the local Museum providing both business and pleasure to hundreds of people throughout the year.

Included files

Title Question: Evidence Base

ID EGS1641

Person ID 1262323

Full Name Emma Hilder

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment

Included files

Title Question: Evidence Base

ID EGS1713

Person ID 1149470

Full Name Mrs Fiona Reavell

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	New housing demand data should be used.
Included files	
Title	Question: Evidence Base
ID	EGS1722
Person ID	1262353
Full Name	L HOUSDEN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	See attached representations - It is TTC's view that the overall strategy of directing so much growth to Tring is flawed. The impact of this level of development upon the Beechwoods SAC has not been assessed. Furthermore, the information regarding existing and proposed traffic levels is not yet available.
Included files	Tring Town Council - Completed consultation Comments Form (Final).pdf
Title	Question: Evidence Base
ID	EGS1747
Person ID	1262353
Full Name	L HOUSDEN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

<p>Yes / No * Yes * No</p>	<p>No</p>
<p>QUESTION: Evidence Base comment</p>	<p>4.6. The Green Belt in this Borough has been subject to a number of reviews and assessments over recent years. ‘Stage 1’ was carried out in November 2013 by SKM for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council. Since then, Arup has been commissioned by Dacorum to carry out 2 reviews of Green Belt in the Borough. These were the:</p> <ul style="list-style-type: none"> • ‘Stage 2 Green Belt Review and Landscape Appraisal Report’, which was published in December 2016 (referred to here as the ‘Arup 2016 Report’); and • ‘Stage 3 Green Belt Review - Final Report, 27 August 2020 (referred to here as the ‘Arup 2020 Report’). <p>4.7. Stage 1 Divided the Green Belt of the subject Councils into ‘parcels’ and assessed how well each ‘parcel’ was meeting the 5 Green Belt purposes. The relevant ‘parcels’ for this part of Dacorum were GB03 (“<i>Green Belt Land South West of Tring</i>”) & GB04 (“<i>Green Belt Land North of Tring</i>”).</p> <p>4.8. GB03 - In summary, in respect of this ‘parcel’, the report found that it was making a: “Significant contribution towards preserving the setting of Tring and Tring Park. Partial contribution towards preventing merging (providing strategic gap between Tring and Berkhamsted) and maintain the existing settlement pattern. Overall the parcel contributes significantly towards 1 of the 5 Green Belt purposes”.</p> <p>4.9. In particular it was found that overall, this ‘parcel’ performed a ‘significant’ role in “<i>preserving the setting and special character of historic towns</i>” (however, an element to the west of the ‘parcel’, what subsequently became allocation LA/5 in the previous ‘Site Allocations Plan’, could be released without harm to Green Belt objectives).</p> <p>4.10. GB04 - In summary, in respect of this ‘parcel’, the report found that it was making a: “Significant contribution towards preventing merging (providing strategic gap between Tring and Berkhamsted) and safeguarding the countryside. Partial contribution towards preserving the setting of Dudstell. Overall the parcel contributes significantly towards 2 of the 5 Green Belt purposes” (The two ‘significant’ purposes being: “<i>preventing neighbouring towns from merging</i>” and assisting in “<i>safeguarding the countryside from encroachment</i>”).</p> <p>4.11. Stage 2 - Further detailed assessment of Dacorum’s Green Belt was carried out by Arup and the Borough was further divided into ‘sub -areas’. The allocations at New Mill and East of Tring fall into ‘sub -areas’ TR-A2 & TR-A3 for the purposes of Arup’s 2016 assessment. The land at Dunsley Farm was given the ‘sub-area’ address of TR-A5.</p> <p>4.12. Table 5.2 “<i>Overall Categorisation of Sub-Areas following Purposes Assessment</i>” found that both sub-areas TR-A2 & TR-A3 were “<i>Strongly Contributing</i>” to the “<i>Strength of Green Belt against NPPF Purposes</i>”. Whilst the overall contribution of sub-area TR-A5 to Green Belt purposes was assessed as “<i>moderate</i>”, there were many sub-areas in other parts of the Borough, such as Kings Langley and the Bovingdon Airfield where the contribution to Green Belt objectives was considered to be either “<i>weak</i>” or “<i>weakest</i>”. Only relatively small portions of TR-A2 (broadly equating to the New Mill allocation) and the northern sector of TR-A5 (the allocation at Dunsley Farm) were found to include elements of ‘weaker’</p>

Green Belt, where some boundary amendments might therefore be considered without compromise to wider Green Belt objectives.

4.13. In respect of Sub-area TR-A3 specifically, Arup's 2016 report found: "*Purpose 1 - As a result of the highly open character of the sub-area with few defensible boundaries to contain development, its release would constitute outward sprawl of the large built-up area of Tring beyond its hard edge. It may also compromise the ability of surrounding Green Belt to meet this purpose.*

Purpose 3 - The whole of the sub-area retains an unspoilt, open and rural character and its release would represent severe encroachment into the countryside. It would also reduce the ability of surrounding Green Belt to meet its purposes.

4.14. Furthermore, the Arup study determined that, for part of TR-A2 and all of TR-A3 (the northern and southern parts of what is now allocation Tr03 of the Emerging Strategy): "*the majority of the sub-area is constrained, being classified as Grade 2 Agricultural Land*" and "*Almost the entire sub -area is constrained, being classified as Grade 2 Agricultural Land.*

Additionally, the south western corner, and eastern boundary – *Grand Union Canal* – are designated Local Wildlife Sites. The western boundary is an Area of Archaeological Significance"

(Annex Report 3 - Non-Absolute Constraints Proformas, pages 62 & 64).

4.15. As a result, the 2016 Arup Report reached the unequivocal 'Conclusion' that redesignating the Green Belt in relation to sub-area TR-A3 "*would compromise the ability of the wider Green Belt to meet its purposes*". It then recommended that the sub-area be "*exclude[d] from further consideration*" (Page A19, Arup Stage 2 'Green Belt Review and Landscape Appraisal Report' - Published December 2016).

14/cont

4.16. **Stage 3** – this Stage of the Green Belt Review assessed the potential housing and employment site allocations and advised upon any boundary revisions that might be necessary around the six main settlements including Tring. Arup also carried out "*a complementary but parallel work stream assessing landscape / visual impacts of the potential housing and employment sites....*" (see below).

4.17.

Arup 'Dacorum Borough Landscape Sensitivity Study' of April 2020 (the version available from the Council's website is marked 'Draft') – This document also considered the various Green Belt releases around Tring and assessed their "*sensitivity to change*". Dunsley Farm, New Mill (and Land south of Gannel Farm Bulbourne Road' which has not been allocated in the emerging plan) were all considered to be 'moderately' sensitive to change, whereas the 'Land to the East of Tring' was assessed as being "*Moderate-High*" in its sensitivity. The draft Study explained that this latter rating was "*primarily a result of the intervisibility with the Chilterns AONB, large area of open agricultural land and lack of intrusive urbanising influences which creates a high scenic quality*".

4.18. In the assessment of "*Overall landscape sensitivity*" (see page 206 'Dacorum Borough Landscape Sensitivity Study

' - Draft Report April 2020) the report found: "the parcel is assessed as having a Moderate *-High overall sensitivity to change arising from residential and mixed- use development. This is due to the landscape's level of susceptibility and the fact that the parcel provides a setting for the Chilterns AONB.*

The landscape sensitivity in the fields of Marshcroft Lane south is also assessed as having Moderate-High sensitivity to change, but for different reasons to the rest of the parcel.

There is reduced intervisibility caused by the lower and flatter topography and surrounding vegetation but there is a more intricate field pattern so is more sensitive in terms of scale, pattern and cultural pattern compared with the land north of Marshcroft Lane".

Included files	Tring Town Council - Completed consultation Comments Form (Final).pdf
Title	Question: Evidence Base
ID	EGS1767
Person ID	406469
Full Name	Dr Stephen Douglas
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	Population projections too high, employment opportunities too high
Included files	
Title	Question: Evidence Base
ID	EGS1823
Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS1827
Person ID	1262446
Full Name	Mr Andrew Boothby
Organisation Details	
Agent ID	1175743
Agent Full Name	Kevin Rolfe
Agent Organisation	Group Director, Development & Planning Aitchison Raffety
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>See response to Question 8</p> <p>PLEASE READ PDF ATTACHMENT TO SEE IMAGES AND MAPS IN THE CONTEXT OF THE FULL RESPONSE - TEXT RESPONSE ONLY IS SHOWN BELOW</p> <p>GREEN BELT BOUNDARY -REAR OF CONISTON ROAD KINGS LANGLEY</p> <p>This submission is in relation to the position of the Green Belt boundary to the rear of houses in the lower/eastern part of Coniston Road Kings Langley.</p> <p>See proposals map extract.</p> <p>The boundary line, this submission refers to, is as described by DBC consultants Arups on their drawing below, as line KL.E</p>

We do not agree with DBC's proposal to leave the GB boundary line unchanged.

The current GB boundary is an anomaly; it follows an arbitrary undefined line along a boundary that has no permanence.

The current boundary does not serve any of the 5 purposes that apply in the GB and the boundary should therefore be amended to the logical, permanent and defensible position at the end of the gardens, which are clearly all within the built up village of KL. The new boundary would follow the mature edge of the countryside.

In assessing the GB line at KL.E the consultants state in their conclusion below that "The Green Belt boundary is not demarcated by any physical features; it cuts across residential gardens.."

In their written analysis the consultants accept that para 139 of the NPPF states that "GB boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent"

So by their own analysis they have confirmed that this is not the case, and therefore the fact that they then go on to reject any change is inappropriate.

Para 139 of the NPPF also states that "they must be defensible and well justified to be maintained in the long-term, beyond the lifetime of the plan"

There is no such justification in this case.

Despite the above, the consultants propose no change, as they have stated that there are no apparent "exceptional circumstances".

We do not agree with this being required as a justification. The land is not being proposed as a housing allocation and as stated above, it is simply the case that the current boundary does not comply with Para 139 and does not fulfil any of the 5 purposes.

The consultants accept that para 134 of the NPPF states that for retention of GB land it must meet the 5 purposes.

The 5 purposes are set out below and it is totally clear that the GB in this location does not meet any of these.

If the line was moved to the correct location at the end of the gardens it would then sit rightly at the edge of the countryside and fulfill some of the criteria below.

When seeking to justify if the land meets any of the 5 purposes the consultant has looked at the existing pattern of development and whether the absence of the GB line would lead to a proliferation of householder development "in a way that would harm the permanent openness of the countryside" This is not the same as any of the 5 GB purposes so is an incorrect analysis.

In any event, a change in the boundary line as we propose, would not change anything. PD is allowed in the GB and there are already large modern ancillary structures within the GB within the rear gardens of some properties as per the images included at the end of this submission. So the boundary line change would not make any difference.

Consultants have accepted in all DBC studies that the current GB line is not in a permanent location and slices randomly through gardens at an undefined point.

All reports accept that the whole of the length of the gardens are undoubtedly within the village settlement.

DBC consultants also tested sites to the west and north of the gardens as per the plan below, for potential housing allocations.

The comments below regarding the eastern boundary of site 94, which immediately abut the subject land, make the position clear.

Site 94 above was concluded by the consultants to be potentially suitable for allocation but ultimately not carried forward.

The plan below for site 94 clearly shows the rear garden line of the Coniston road homes to the East.

As for site 88, to the north, which was also tested, the conclusion again, below, clearly accepts that the entire length of gardens are within the “built-up area” of KL.

In conclusion the current GB boundary is simply in the wrong place, it is an anomaly.

It is not permanent nor defensible.

It is within the built-up area of KL.

It does not satisfy the 5 GB purposes.

Exceptional circumstances are not required, it is not being proposed as a housing allocation, it is just in the wrong place.

The boundary should be moved to follow the permanent defensible line at the end of the gardens adjoining open countryside.

Images are included below to illustrate the above points.

VIEWS SHOWING WHERE A PERMANENT, DEFENSIBLE BOUNDARY SHOULD BE, WITH COUNTRYISDE AT REAR

(NOTE: REAR FENCE ON RHS IMAGE IS NOT ON GB BOUNDARY LINE, THE STRUCTURES & FENCE IS BEYOND THE LINE)

GREEN BELT BOUNDARY LINE IS COMPLETELY UNDEFINED

Included files	REDACTED Andrew Boothby - C-O Agent Kevin Rolfe Aichison Rafferty.pdf
Title	Question: Evidence Base
ID	EGS1847
Person ID	1262473
Full Name	Mr William Tannett
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	As already noted, the proposed increases in dwellings indicated in the plan will overwhelm this area and the pandemic will result in changed behaviours, the extent of which is not yet clear.
Included files	
Title	Question: Evidence Base
ID	EGS1872
Person ID	1262495
Full Name	Jason Nell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS1933
Person ID	1262553
Full Name	Henry Wallis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
QUESTION: Evidence Base comment	There is so much information that it is important for a "normal" resident to review.
Included files	
Title	Question: Evidence Base
ID	EGS2032
Person ID	1262604
Full Name	Ray Smith
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
QUESTION: Evidence Base comment	GL Hearn, South West Hertfordshire Local Housing Needs Assessment clearly states that Dacorum has no need to build more housing in addition to the developments already underway. Talk ever increasing growth is outdated and unnecessary. Since the Brexit Referendum, the population of Britain is estimated to have fallen by one million. The full impact of COVID-19 on work and retail habits has yet to be assessed. Dacorum should be focussing on repurposing empty shops and offices rather than looking for building sites on Green Belt.
Included files	
Title	Question: Evidence Base
ID	EGS2036
Person ID	1262601
Full Name	Anne Smith
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS2066
Person ID	1262738
Full Name	Alan Pierce
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS2120
Person ID	1262797
Full Name	NICK TURNER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS2173
Person ID	1261286
Full Name	John Saner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	For reasons already stated elsewhere in this submission, I believe the assumptions on which the proposals are based are flawed.
Included files	
Title	Question: Evidence Base
ID	EGS2186

Person ID	1262762
Full Name	Eric Dodman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	It is all woolly wishful thinking with an air of deperation to try to keep the government off your back. Please think again.
Included files	
Title	Question: Evidence Base
ID	EGS2237
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	EvidenceBased. Building volumes not in keeping with the areas, far to much development. Numbers based on an outdated matrix which should be reviewed.
Included files	
Title	Question: Evidence Base
ID	EGS2277
Person ID	1262925

Full Name	Nandipha Jordan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>The evidence base needs to be reconsidered after the affects of this current pandemic are known.</p> <p>The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:</p> <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan • Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers
Included files	
Title	Question: Evidence Base
ID	EGS2316
Person ID	610662
Full Name	Mr Antony Harbidge
Organisation Details	Chairman Berkhamsted Residents Action Group (BRAG)
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment

There is no doubt that the evidence base is extensive and very, very weighty. Certainly, DBC have produced more material than any respondent could possibly digest within the time frame of this consultation.

Many members of BRAG believe the whole process is deliberately weighted against their inclusion, a belief exacerbated by being overladen with material/evidence that has little bearing on the process and conclusions, while it also offers no evidence that DBC have done anything other than dismiss their views expressed in the last Issues And Options consultation.

Nearly 95% of respondents to the 2017 consultation didn't agree with the proposed approach to Green Belt and Major development sites. Yet, despite the sheer amount of reports supplied, there is precious little evidence that DBC have explored how to give the Borough's Green Belt the protection that the NPPF demands.

BRAG produced its own Green Belt report (Berkhamsted Town Council adopted and forwarded to DBC), but despite claiming to engage the Community (a claim repeated in this Plan) DBC ignored BRAG's submission in favour of desk-based reports compiled by consultants who had no knowledge of the area. BRAG's report clearly identified confirmation bias throughout the reports.

Confirmation bias exists throughout DBC's evidence base. In simple terms, a question is asked and consultants formulate reports to confirm the required answer.

In this case, the question mostly revolves around how to provide a plan that facilitates a housing target supplied by Government, rather than asking what is an appropriate target for the Borough? There is absolutely no attempt to provide evidence that the Government numbers are right or wrong for Dacorum, despite 95% of the residents clearly telling DBC the numbers were wrong in the 2017 consultation.

The evidence base is absolutely the right place for DBC to challenge the Government numbers and the methodology, but they make no attempt to do so.

The 2016 South West Hertfordshire Strategic Housing Market Assessment (SHMA) identified a housing need of 756dpa for Dacorum, but that was dumped in 2020 SHMA for the 1023dpa based on the Governments Standard methodology, which is based on national requirements rather than local needs.

That 1023dpa was then replaced for this consultation with 922dpa target based on a Government algorithm that later discredited and dubbed the 'mutant algorithm'. The reason the 'mutant algorithm' has been dropped since the publication of DBC's plan is because it was challenged.

The evidence base is absolutely the right place to challenge the Government algorithms and numbers and why excessive houses cannot be accommodated in Dacorum.

DBC are now likely to claim they must accept 1023dpa, but like the 'mutant algorithm' the Standard Method needs challenging – it employs an affordability coefficient to 2014 ONS data.

The NPPF requires the latest data to be used so it is illogical that the Government should enforce numbers based on out-of-date data. The 2018 ONS based projections represent the latest data and if the Standard Methodology is applied to the latest ONS growth predictions, Dacorum's housing need would be calculated at 497dpa.

Growth predictions by ONS have reduced between 2014 and 2018; one might surmise that Brexit and an international pandemic will have reduced growth rates further. Indeed, the birth rate has been falling steadily since 2012 when it peaked at 1.93 (2.1 is required to maintain a steady population) and is now down to 1.60 in England, and even lower in Scotland.

This doesn't necessarily mean the population is falling, because older people are living longer, but if you factor in a Brexit brain drain which has already started, the return home of many EU nationals (also already started) and the Government's policies on immigration, then one might possibly anticipate that we will follow the trend in Spain, Germany, Japan etc. where populations are falling.

This may not fit in with Governments 'build, build, build' mantra, but DBC have a responsibility to the Borough and its residents, both current and future, to build the right homes in the right places.

The first step in that is exploring what constitutes the true need of the Borough and the true ability to fulfil that need within the constraints of the Borough, including Green Belt as dictated by the NPPF. DBC have palpably failed to do this.

Nor have DBC considered the effects of the current pandemic within their evidence base, despite request from many community bodies and organisations, such as BRAG, who also requested a delay to this reg 18 consultation to give DBC more time to do so.

BRAG has highlighted worries and discrepancies about the way DBC have handled windfall calculations (see sections 5,7 and 25). DBC state their windfall predictions *“have been calculated using historic delivery rates and expected future trends. We believe it is justified based on past local evidence and is a reliable source of supply across the Plan period.”*

However, the last 14 year average for windfalls have come in at 306.2dpa (346.3dpa over the last 5 years) and there is no justification or evidence presented to suggest the Council should lower future windfall projections to 133.8dpa (asper Table 2) from either the 14 year or last 5 year averages, especially considering evidence of changing working practices post-pandemic.

Despite its excessive bulk, the Evidence Base that accompanies the Plan is clearly not adequate, up-to-date and relevant for Dacorum’s needs.

BRAG’s members also disturbed by the inaccuracies within the main consultation document, specifically the highlighting of land as open space that has already been developed and giving a large private garden open land status.

BRAG understands that technically all sports fields are ‘open land’, but it is stretching the definition to include a private garden, private tennis courts, fully enclosed private football pitches and school grounds that cannot be accessed by the general public. BRAG’s members believe the Council are clearly being misleading in trying to indicate there is more Open Space within the town than there actually is.

Included files	
Title	Question: Evidence Base
ID	EGS2328
Person ID	1262984
Full Name	Deborah O'Sullivan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	

QUESTION: Evidence Base comment	<p>I do not believe that the Evidence Base is up to date or accurate.</p> <p>The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.</p> <p>The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.</p> <p>The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.</p> <p>Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date 2018 data.</p>
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Included files	
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Title	Question: Evidence Base
ID	EGS2407
Person ID	1261821
Full Name	Chris Cole
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	<p>One look at the vast number of documents and schedules under the heading "Single Local Plan Evidence Base" suggests it is an exercise in obfuscation. I have no intention of attempting to read it unless it is presented in a coherent summary form with the key areas highlighted. This does not give confidence in the transparency of the consultation process.</p>
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Included files	
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Title	Question: Evidence Base
ID	EGS2441
Person ID	1227518
Full Name	Mr John LOWRIE

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	Ha Ha, Does it matter if the figures are up to date if the targets are set by 2014 figures. The traffic figures haven't been done yet. So I'm sure they will be fine. But you do have to laugh at the question.
Included files	
Title	Question: Evidence Base
ID	EGS2465
Person ID	1151964
Full Name	MR RICHARD COWIE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS2468
Person ID	1262981
Full Name	Chris Mabley
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Not up to date enough
Included files	
Title	Question: Evidence Base
ID	EGS2477
Person ID	1263080
Full Name	Russell Emson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS2515
Person ID	1263140
Full Name	Mr B & Mrs A Goddard
Organisation Details	
Agent ID	1262938

Agent Full Name	Steven Barker
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS2528
Person ID	1263143
Full Name	Manlet Group Holdings Limited
Organisation Details	
Agent ID	1262938
Agent Full Name	Steven Barker
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS2650
Person ID	1263231
Full Name	Mr Phil Robinson
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS2661
Person ID	1263235
Full Name	Mrs Vanessa Robinson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and</p>

contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS2672

Person ID 1161597

Full Name Stuart Mears

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title	Question: Evidence Base
ID	EGS2681
Person ID	1263237
Full Name	Dr Alice Mears
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS2690
Person ID	1263240
Full Name	Stuart and Val Burnett
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS2700
Person ID	1263241
Full Name	Mr Stephen Hurley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p>

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS2711

Person ID 1263245

Full Name Mr Paul Barritt

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID	EGS2820
Person ID	1263287
Full Name	Jeremy Bonnar
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS2832
Person ID	1263206
Full Name	Andrew Farrow
Organisation Details	Great Gaddesden Parish Council
Agent ID	1253616
Agent Full Name	Andrew Farrow
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The following are missing: - A finalised infrastructure report - A finalised transport report (including a non-technical assessment of traffic flows) - A coherent Sustainability Assessment
Included files	
Title	Question: Evidence Base
ID	EGS2847
Person ID	1263198
Full Name	Jillian Hipson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	26.1 The evidence base is based on out-of-date ONS statistics from 2014. There have been a lot of changes in the 7 years since then. The last year of pandemic and lockdown has changed our society substantially. Therefore the evidence base is not up to date or relevant.
Included files	
Title	Question: Evidence Base
ID	EGS2886
Person ID	1263425
Full Name	Andrew Farrow
Organisation Details	Nettleden with Potten End Parish Council
Agent ID	1253616

Agent Full Name	Andrew Farrow
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The following are missing: - A finalised infrastructure report - A finalised transport report (including a non-technical assessment of traffic flows) - A coherent Sustainability Assessment
Included files	
Title	Question: Evidence Base
ID	EGS2938
Person ID	1263377
Full Name	Jane Messenger
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS2975
Person ID	1164709
Full Name	Dianne Pilkington

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS3002
Person ID	1263478
Full Name	ELIZABETH RAILTON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Evidence Base comment	<p>Managing Development in the Countryside: I am particularly concerned that the evidence base for there being exceptional circumstances that permit land to be taken out of the Green Belt is not adequate.</p> <p>Housing Delivery: the evidence base for the numbers of homes required across the area is unlikely to be future proof given the likely societal and economic changes emerging post pandemic. In these circumstances the assault on the Green Belt cannot be justified in terms of meeting the housing numbers being put forward.</p>
Included files	
Title	Question: Evidence Base
ID	EGS3003
Person ID	1262892
Full Name	Jean Farrer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	See my other responses. I do not accept your justification for the overall housing target and there is no evidence to support your removal of up to 850 hectares of Green Belt within the context of the NPPF which requires evidence of 'exceptional circumstances'. The Housing Minister in 2016 said that this cannot be met by housing need alone.
Included files	
Title	Question: Evidence Base
ID	EGS3013
Person ID	1261190
Full Name	Neil Harwood
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS3014
Person ID	1258924
Full Name	Natalia Maghdoori
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	

Title	Question: Evidence Base
ID	EGS3068
Person ID	1146084
Full Name	Mr Jason Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>I have been informed from a number of sources that the Evidence Base is neither up to date or accurate.</p> <p>The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.</p> <p>The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.</p> <p>The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.</p> <p>Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date 2018 data.</p>
Included files	
Title	Question: Evidence Base
ID	EGS3100
Person ID	1263499

Full Name	Mrs Angela Burgin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS3115
Person ID	1261485
Full Name	Douglas Adams
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	No

* No	
QUESTION: Evidence Base comment	Impact of Covid and Brexit needs to be factored in to the plan.
Included files	
Title	Question: Evidence Base
ID	EGS3126
Person ID	1263514
Full Name	SAM LETHEREN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS3148
Person ID	1263526

Full Name	MR NICK RIPPER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS3171
Person ID	1263537
Full Name	MRS SARAH RIPPER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	No

* No	
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS3187
Person ID	1263550
Full Name	ANNABEL FRANCIS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p>

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS3247

Person ID 1263566

Full Name Frances Read

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

Included files

Title Question: Evidence Base

ID EGS3257

Person ID 1155396

Full Name Jane Hodgson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS3293
Person ID	1263610
Full Name	BRYN HENRY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p>

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS3306

Person ID 1263620

Full Name EMMA SIMMONDS

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

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Included files

Title	Question: Evidence Base
ID	EGS3320
Person ID	1263631
Full Name	GAVIN NICHOL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS3334
Person ID	1263643
Full Name	IAN DESTTE
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS3414
Person ID	1263763
Full Name	Adam Kindred
Organisation Details	CBRE
Agent ID	1263757
Agent Full Name	Adam Kindred
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	<p>The evidence base that has been produced by the Council is detailed. We have no specific comments to raise at this stage and await the publication of the Habitats Regulation Assessment in due course which forms a key component of the evidence base and the approach to the spatial strategy.</p> <p>Across a range of key evidence base documents (Landscape Sensitivity Study, Green Belt Study, Site Selection Paper, Sustainability Appraisal) the site performs well, scoring consistently with those sites that have been allocated in the plan. From the evidence that has been collated on Hill Farm it would be justified on the evidence to allocate the site for development.</p>
Included files	
Title	Question: Evidence Base
ID	EGS3452
Person ID	1263124
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p><i>While the Local Plan uses the PPS 2019 (which is required by the NPPF) as part of its evidence base it does not follow the strategic advice and guidance offered within the strategic elements of the PPS.</i></p> <p><i>For example, the PPS states:</i></p> <p>“OBJECTIVE 2 - To enhance outdoor sports provision and ancillary facilities through improving quality and management of sites.</p> <p>Recommendations:</p> <ol style="list-style-type: none"> 1 Improve quality 2 Adopt a tiered approach (hierarchy of provision) to the management and improvement of sites. 3 Work in partnership with stakeholders to secure funding 4 Secure developer contributions.” <p><i>- and -</i></p>

“The PPS should be used to help determine the likely impact of a new development on demand and the capacity of existing sites in the area, and whether there is a need for improvements to increase capacity of existing provision or if new provision is required. Where a development is located within access of existing high-quality provision, this does not necessarily mean that there is no need for further provision or improvement to existing provision, as additional demand arising from the development is likely to result in increased usage (which can result in overplay or quality deterioration).

Where it is determined that new provision is required to accompany a development, priority should be placed on providing facilities that contribute towards alleviating existing shortfalls within the locality. To determine what supply of provision is provided, it is imperative that the PPS findings are taken into consideration and that consultation takes place with the relevant NGBs. This is due to the importance of ensuring that the stock of facilities provided is correct to avoid provision becoming unsustainable and unused, such as single grass pitch football sites without adequate ancillary facilities or new cricket/rugby grounds located away from existing clubs. Instead, multi-pitch and multi-sport sites should be developed, supported by a clubhouse and adequate parking facilities which consider the potential for future AGP development.

The Council should look to include priority projects from within the PPS Action Plan for inclusion within its Infrastructure Delivery Plan as a mechanism of ensuring that CIL receipts are identified towards appropriate projects for sport.

To support the implementation of this recommendation, KKP has prepared a developer’s contributions guide for playing pitches (provided separately to the Council). The guide should form the basis for negotiation with developers to secure contributions to include provision and/or enhancement of appropriate playing fields and subsequent maintenance. “

- and –

“**OBJECTIVE 3**

To **provide** new outdoor sports facilities where feasible and there is current or future demand to do so.

Recommendations:

- 1 Identify opportunities to add to the overall stock to accommodate both current and future demand.
- 2 Rectify quantitative shortfalls through the current stock.“

- and –

“**HOUSING GROWTH SCENARIOS**

Experience shows that only housing sites with 600 dwellings or more are likely to generate demand for new provision to be created. For large scale developments, it is likely that demand will be potentially generated for larger sports such as football and/or cricket. Consideration should be given to providing multi-pitch sites with suitable ancillary provision, including appropriate clubhouse/changing facilities and carparking. Single pitch sites which have been provided traditionally by developers are not considered to provide long term sustainable provision for pitch sports.“

Indoor Facilities

Overall Comment:

The key evidence for assessing Indoor Sports and Leisure Facility requirements in the Borough are the DBC Indoor Leisure Facilities Assessment 2019 and the Leisure Facilities Strategy 2019.

NB The total population of Dacorum was 153,316 in 2017. This statement and the entire DBC Indoor Leisure Facilities Assessment 2019 (and Leisure Facilities Strategy 2019) base projected growth to 2036 on ONS statistics at the time of just 13.6% (an additional population of 20,680 residents). The numbers now proposed in the Emerging Strategy for Growth are for an increase of more than double this; and HGC will add further significant growth Therefore the data in the key evidence offered for Indoor Sports Facility demand and new facility development is seriously under-estimated – which is true for all the following extracts on indoor sports and leisure activities.

The DBC Indoor Leisure Facilities Assessment 2019

The following extracts from this key piece of evidence for the plan all show a need for increased provision of Indoor Sports Facilities across the Borough and especially for Sports Halls and Swimming Pools – with an increase in demand that is severely understated as shown above.

The Assessment states on the Projected Housing Growth:

“Pg 27 The anticipated level of housebuilding to 2036 will, undoubtedly, place additional pressure on local sporting infrastructure at all levels. In particular, it is likely that the major planned growth in Hemel Hempstead will require additional sport and leisure facilities.”

The Assessment states in its Strategy Summary:

“Pg 106 On confirmation of the proposed housing development for the borough, paying particular regard to the development of Hemel Garden Communities, and in close association with St Albans City & District Council, re-evaluate the sporting needs of the communities, using this needs assessment as the start point.”

“Support gymnastics clubs to identify where and how additional recreational gymnastics can be accommodated, leading to overall increase in levels of participation in the sport. “

“Ensure that all school sports facilities accommodate community use. In particular, ensure that new school sports buildings (e.g. Hemel Hempstead and Tring schools) have appropriate and robust community use agreements in place.“

The Assessment states relating to Gymnastics:

“7.3 Consider making additional provision available at the refurbished leisure centre in Tring.

Larger dedicated facilities are required in the Authority to meet existing demand.

Additional recreational gymnastics provision is needed to meet current demand.

The projected housing growth within the area is likely to lead to increases in demand for gymnastics, particularly at recreational level.”

The Assessment states relating to Health and Fitness:

“6.4 Additional health and fitness provision may be required to accommodate the increased demand caused by projected population growth especially if the popularity of fitness continues to increase. It is highly likely that increased health and fitness provision will be required when the HGC development is brought forward.”

The Assessment states relating to Swimming Pools:

“5.6 By 2036 there will be a need for an additional swimming pool equivalent to 25m x 4 lanes in size.

Investment is required in the pool stock to ensure they remain attractive and fit for purpose. This is particularly the case for Berkhamsted Leisure Centre which requires significant refurbishment or replacement.

Hemel Garden Communities proposes significant development up to 2050. It is unlikely that this demand can be met by current facilities. Therefore, additional supply will need to be considered (dependent upon the chosen development for HGC). “

The Assessment states relating to Sports Halls:

“4.6 Continue to monitor use at indoor sports halls as projected new developments come forward as this will create additional demand for sports hall space, either at established clubs or in the form of different new sports/ physical activity opportunity being developed.

Further assessment will need to take account of the Hemel Garden Communities development as the new homes become a reality. “

“Netball is a key sport in Dacorum, training sessions should be accommodated indoors where possible to meet clubs’ training demand.”

“Badminton England identifies Dacorum as a priority area with a focus on increasing junior activity.”

“Volleyball is identified as a sport for growth, subject to venues having the facility requirements. Any new provision should consider incorporating volleyball fixtures and fittings to facilitate development in this sport.”

Futsal

Comment: Futsal is one of the world’s fastest growing sports. The Football Association has targeted “A defined network of Futsal facilities, covering every County FA” by 2024. Futsal has not been considered or covered in either of the Indoor Sports Evidence Documents but will undoubtedly provide a significant increase the demand upon sports halls in Dacorum over the coming years

Included files	
Title	Question: Evidence Base
ID	EGS3487
Person ID	1263805
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

QUESTION: Evidence Base comment	<p><i>The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</i></p> <p><i>The emerging Local Plan is not ‘Justified’ by evidence, ‘Effective’, or ‘Consistent with national policy’. In respect of the extensive and unnecessary Green Belt releases; potential impacts upon heritage assets, the AONB & the SAC; and the profligate use of high-quality agricultural land; the emerging plan cannot be said to be in accordance with the NPPF.</i></p>
Included files	
Title	Question: Evidence Base
ID	EGS3524
Person ID	1263824
Full Name	Nichola Criddle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p><i>The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</i></p> <p><i>The emerging Local Plan is not ‘Justified’ by evidence, ‘Effective’, or ‘Consistent with national policy’. In respect of the extensive and unnecessary Green Belt releases; potential impacts upon heritage assets, the AONB & the SAC; and the profligate use of high-quality agricultural land; the emerging plan cannot be said to be in accordance with the NPPF.</i></p>
Included files	
Title	Question: Evidence Base
ID	EGS3568
Person ID	1263821
Full Name	Anne Isherwood

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The target housing numbers are not supported by evidence of the latest ONS figures and previous Dacorum projections.
Included files	
Title	Question: Evidence Base
ID	EGS3622
Person ID	369415
Full Name	Mr Dacorum EnvironmentalForum
Organisation Details	Chair Dacorum Environmental Forum Waste Group
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The following have yet to be produced:</p> <ul style="list-style-type: none"> • Climate Change and Sustainability SPD • Detailed Design Guide SPD • Climate Change Strategy and Action Plan <p>Until these documents are produced and made available for public comment, the NLP should be considered incomplete.</p>

For our full response see:
 The attached document if you are receiving this by E-mail
 The link below if you are viewing this online
<http://dacenvforum.org.uk/> and look under "Consultations etc."

Included files

Title Question: Evidence Base

ID EGS3638

Person ID 1263885

Full Name Mr Neil Roberts

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID	EGS3645
Person ID	1145631
Full Name	Mr Alastair Greene
Organisation Details	Clerk Little Gaddesden Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS3745
Person ID	1263908
Full Name	Thomas Burger
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	This is an outdated survey
Included files	
Title	Question: Evidence Base

ID	EGS3766
Person ID	1263921
Full Name	sarah diehl
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS3781
Person ID	1263939
Full Name	Mr Richard Dawkins
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Paragraphs 2.11, 5.2 and 5.9 of the Berkhamsted and Tring Sustainable Transport Study state that the study was impacted by COVID-19 with on-site observations made in person replaced by online aerial and ‘streetview’ photography. The report acknowledges that “more detailed observations and measurements [...] are more difficult to obtain using online tools” (Footnote 56: paragraph 5.2, p71: Berkhamsted and Tring Sustainable Transport Study, November 2020). This is something of an understatement as online tools are not able to provide measurements across different parts of the day but rather are single point in time. The study, while nevertheless acknowledging some of the natural constraints in Berkhamsted, underestimates the road congestion at peak times and the challenges in creating a new sustainable

transport network that is an alternative to the car. With more accurate evidence, it would be even clearer that Berkhamsted cannot sustain the level of growth proposed and, moreover, that growth area Bk09: Bank Mill Lane should be removed from the Draft Plan.

As noted in the response to question 5, the south west herts level 1 strategic flood assessment appendices set out in the evidence base do not appear to have been completed but separate analysis from the Government's flood warning information service (Footnote 57: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?easting=500462&northing=207091&map=SurfaceWater>) shows there is a high risk of flooding through the centre of the Bank Mill Lane site.

Included files

Title Question: Evidence Base

ID EGS3824

Person ID 1263962

Full Name Susie Alderson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

Included files

Title Question: Evidence Base

ID EGS3891

Person ID 488516

Full Name mr hugh siegle

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	The Berkhamsted and Tring Transport Strategy paints a false or biased picture. Like much of the evidence used in this Plan it is presented in support of a decision already made and does not represent reality and what actually happens on the ground
Included files	
Title	Question: Evidence Base
ID	EGS3902
Person ID	1263998
Full Name	Mrs Lara Dixon
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The plan is based on out of date information regarding predicted housing needs in the future. The council should be looking at using predictions from the latest ONS 2018 data and not use the older 2014 data. The evidence base is not up to date or valid.
Included files	
Title	Question: Evidence Base
ID	EGS3956
Person ID	1264025
Full Name	Caroline Sherwen
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS3985
Person ID	1263016
Full Name	Joanna Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>Housing numbers</p> <p>DBC has used outdated (ONS 2014) housing projections, whereas it is required to use the most recent and relevant ONS projections (2018) so I do not agree that the Evidence base is adequate, up-to-date and relevant.</p> <p>Please see Topic Paper 'Development Strategy November 2020': this tracks the history, marshals the data and argues that the dwelling numbers for the Reg18 Plan meets the housing needs for the Borough viz 922 [or recently 1023] pa. I don't believe this is the correct basis for the Plan – which is based on 'national requirements' rather than local needs.</p> <p>The data below is drawn from reliable sources e.g. ONS and the study commissioned by the Districts' Joint Housing Needs Assessment quoted in the Plan.</p> <p>The current dwelling numbers established in the Adopted 2013 Core Strategy sets an annual build rate of 430 pa.</p>

The Data shown in Fig 2 Housing Trajectory 2020 – 2038 [p 38] records anticipated completions across the Borough for 2020/21 as 654 and 21/22 as 1036 . These are **well in excess** of the Core Strategy and also the numbers projected by ONS.

The numbers set for the Draft Plan have been based on the ONS projections of housing ‘need’ but manipulated by a formula adopted by MHCLG to determine the ‘national requirements’ stated in Para 6.7 above.

Dacorum

ONS projection of Dacorum annual housing growth

After adjustment by MHCLG algorithm

After adjustment by MHCLG algorithm

ONS 2014

730

1023 [new standard applied]

ONS 2018

355

922 [mutant applied]

497 [new standard applied]

As a result, I object to the adoption by DBC of the Ministry’s numbers: a lesser number to meet the assessed local needs must be agreed upon. This must lead to a revision of the site allocations and a new Plan.

Included files

Title Question: Evidence Base

ID EGS3996

Person ID 1261840

Full Name Rachel Heath

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS4006
Person ID	1263249
Full Name	Claire Whitely
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The councils assessment of green belt land within the borough is not up to date. It identifies substantial variances in the character, appearance and contribution of the green belt but allocation of land for development is arbitrarily done.</p> <p>The review of sites has not actually been done against the 2019 NPPF, but older versions, and simply aims to show how compliant it might be with the up to date version. Heavy reliance has been placed on trying to demonstrate exceptional circumstances have been met by referencing case law. However, in each case referenced, the housing need calculation is not in doubt. Paragraph 137 of the framework cannot be met through this review as it has not been proven that the 5,945 homes need to be built on the green belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS4037
Person ID	1261199
Full Name	Will Bentley
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The Local Housing Plan is based on out dated information. The ONS in 2018 revised its forward view of required housing to meet demand across Dacorum and this is not reflected in the Local Plan - in fact the target in the plan is almost 3 times that stated by the ONS in 2018!</p> <p>The Government changed its policy and backtracked on the algorithm used and it appears that Dacorum have then used a bastardisation of old, inaccurate data and a fudge to keep housing numbers unnecessarily high</p>
Included files	
Title	Question: Evidence Base
ID	EGS4142
Person ID	1264064
Full Name	Melanie Ingram
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>

All of which does not take into account the impacts of the pandemic and the potential irreversable change to peoples working habits and that more bsuinesses may aim to enable more home/remote working to reduce future risks to business.

Included files

Title Question: Evidence Base

ID EGS4209

Person ID 1263248

Full Name Johnjo McDermott

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

I am opposed to the development of proposed site Tr01

Whilst supporting the efforts of Dacorum to play its part in solving the national housing shortage, particularly for local young people who cannot afford houses, we strongly oppose the Dacorum local plan 2020 to 2038 as currently proposed.

The number of new homes needed:

... is based on outdated figures: the plan is based on Office of National Statistics data from 2014, the more recent predictions of 2018 more than halve the number of new homes needed in Dacorum, and even that data is from before Brexit and Covid so out of date.

... the housing target for Hertfordshire is higher than the comparable counties of Surrey and Sussex (www.lichfield.uk).

... there must be a binding commitment for affordable homes in the plan. Too often developers have been allowed to wriggle out of this commitment. Tring is not suitable for this kind of increase in population:

... there is no capacity for more footfall at the station, the car park gets full and the trains to London overcrowded (based on pre-covid numbers).

... the High Street is unsuitable, as the main throughfare from east to west Tring the High Street is narrow and overcrowded for both traffic and pedestrians at peak times. The structure of the High Street has subsided with the current levels of traffic, this will only get worse.

... under the current proposals Tring bears the brunt of new housing with more homes than other towns in Dacorum (percentage terms).

... there are currently electric vehicle charge points in Forge car park and at Tesco, this is clearly insufficient for a town the size of Tring. Environment

... the plan should allocate land for new allotments for the residents so they can grow their own fruit and vegetables.

... the plan must commit to increase habitat for wildlife, including wildlife corridors and re-wilded areas to increase bio-diversity.

... there should be recreational corridors built into the plan to promote cycling and walking in a safe environment, they should be wide with natural vegetation and not narrow alleyways.

Sustainability

... Building Standards, the plan uses the right words to describe sustainability standards, but offers no commitment to these. All new buildings should be designed to meet the most stringent standards and must be at least net zero carbon. Every home should include a parking space with electric charging, should not be reliant on fossil fuels for heating and should include solar PVs. There is no commitment to this in the Local Plan.

... Public Transport, the plan makes no promise to improve public transport to connect these homes, so people do not have to rely on cars on a road structure that in many cases cannot be widened.

Summary

... Dacorum has declared a climate emergency, this plan should give the opportunity to put that into practice and create an inspirational environment where we can live and work together with nature. Instead the Local Plan is unimaginative and will become a developers dream of suburban sprawl, not something we will be proud of. If there is one thing that has become apparent in recent years, it is that we can't carry on as before and that we need to find a better way forward.

Included files	
Title	Question: Evidence Base
ID	EGS4227
Person ID	1264301
Full Name	James Stringer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	

QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS4244
Person ID	1207786
Full Name	Anne Foster
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The SA acknowledges issues with Water supply, Drainage and Sewage handling capacity, but the latest Water Scoping Study was produced back in in 2010 as evidence to support the Core Strategy. As we are now potentially looking at 1023 dpa almost 3x the housing numbers proposed, in the Core Strategy (430dpa)and significantly more then the worst case scenario in the existing study, a new study is urgently needed, before the plan can be finalised.</p> <p>The environment agency have said that extraction from the aquifers is at its maximum, and the site assessment summary (table 5-5 in the Interim SA report) shows "unknown " as the impact assessment for water against almost all Berkhamsted sites.</p>

Water runoff is already an issue with rivers running down down steep roads (Crossoak Road and the Roads in Hall Park) in wet weather with High street manhole covers lifting as the drains are overwhelmed.

Further Development at the top of the valley will just exacerbate the problem.

The existing developments on Shootersway on land which slopes down to the A41 have issues with sewage, which needs to be pumped to the Main Sewer on Shootersway – presumably this will also be an issue for many of the new developments.

Included files

Title Question: Evidence Base

ID EGS4247

Person ID 1264320

Full Name JACKIE GLOSSOP

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment

I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title	Question: Evidence Base
ID	EGS4285
Person ID	1264269
Full Name	Paul de Hoest
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>Numerous local groups have commented on this consultation including Berkhamsted Residents Action Group (BRAG), Berkhamsted Citizens Association, CPRE, Chiltern Society, Berkhamsted Town Council, Dacorum Green Party, Berkhamsted and Tring Labour Party to name a few. I agree with the stance taken by all of these groups. The fact that all these (and there will be others) are providing the same substantive message from the local population to you should demonstrate that these proposals do not have the support of the people. I do not propose to add to your reading burden by rehashing all of their points but I do make the following observations.</p> <p>Basing the target housing need on outdated ONS data was the wrong this to do. 2018 date suggests a much lower housing requirement would be appropriate.</p> <p>The whole concept that the house price increases are a significant function of housing need that can be rectified by a massive house building programme is simply false. The reason for the excessive house price increases is due to very lax monetary policy and a capital regime for banks that favours mortgage lending. Too much cheap money means that people can afford to pay more for housing and has encouraged people to use housing as a financial investment rather than simply as a place to live. Building more houses with the same monetary and regulatory policies will simply add more wealth to the already wealthy and will create huge windfall profits for house builders but will do nothing for affordability.</p>
Included files	
Title	Question: Evidence Base
ID	EGS4368
Person ID	1262873
Full Name	Donna Atkinson
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS4474
Person ID	1264316
Full Name	Melanie Turner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	The Council is using outdated (2014) housing projections. The 2018 ONS data should be used. The number of houses proposed will put significant pressure on the current infrasture i.e. GPs, hospitals, schools.
Included files	
Title	Question: Evidence Base
ID	EGS4505
Person ID	1264395
Full Name	R Jane Dickson
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	As explained already, Central Government's requirement to provide nearly 17,000 new houses in Dacorum by 2038 is not based on the most up-to-date ONS figures. The effects of the Covid-19 Pandemic now also need to be considered.
Included files	
Title	Question: Evidence Base
ID	EGS4550
Person ID	1261836
Full Name	Richard Sutton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>My family and I moved to Dacorum in 2018 to settle in Berkhamsted for at least the next 25 years. Over this time, we look forward to developing ever stronger links throughout the community and watching our young children grow to adulthood. As such, we have a vested interest in seeing the Borough grow in a way that works for all its citizens – both existing and new.</p> <p>Against this backdrop, I wish to formally state my strong objections to the 'Dacorum Local Plan (2020-2038) Emerging Strategy for Growth'. The evidence suggests that, if this plan is approved, your personal legacy will be of considerably worsening towns and communities within the Borough. For new residents moving to the area and for those already here. For all ages. And for all financial situations. I suspect you don't want to be remembered after you leave this office as the person who caused such damage to an area. So, I ask you to fundamentally rethink.</p> <p>Due to the COVID-19 constraints on travel and mingling for the past year, my experience, and hence prime objection, focuses on the portions of the Local Plan relating to developments in the Berkhamsted area.</p>

To summarise:

1. Flawed modelling of number and type of housing required would fail to meet the actual needs of the voters moving into the area, whilst disrupting those already here far more than is needed.
2. Inadequate commitment to transport infrastructure needs to accommodate the changes proposed would result in a legacy of decades of traffic congestion for voters in Dacorum and visitors to the area.
3. Insufficient provision of water supply, wastewater disposal and other infrastructure would leave households with shortages and damage the local water table, with knock-on considerations around subsidence and environmental impact.
4. Unworkable assumptions around public transport and foot / bike journeys would see considerable increase to carbon emissions in the Borough and considerable travel delays around vital transport hotspots (town centres, schools, rail stations, etc.).
5. The above worsening of conditions for the new and existing voters in the area also comes with an ecological cost due to the loss of green belt. If green belt is to be repurposed, it must be done in a way that makes the greatest positive impact for the current and future residents of Berkhamsted. This plan wastes that sacrifice.

These are fundamental flaws in the strategy underpinning the 'Dacorum Local Plan (2020-2038) Emerging Strategy for Growth'. As such, this plan should be rejected outright, and a new plan drawn up that addresses the actual needs of the area for today and the long-term success of the Borough.

These points are expanded below.

Incorrect Assumptions for Housing Provision

Whilst accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, the scale of proposed development in Dacorum is out of balance with the long-term needs.

The Local Plan does not take account of National Planning Policy Framework (NPPF), paragraph 11, footnote 6, which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and Area of Outstanding Natural Beauty (AONB).

Recent Government guidance on calculating housing need has been, at best, confusing. The algorithm for calculating housing need that has been used by the Council is a flawed means to calculate the housing needs of the Borough, based on old data.

The correct calculation of the housing needs in Dacorum should be based on the most recent and relevant data, which is currently the 2018 based Office for National Statistics (ONS) projections. Instead, the Local Plan is based on calculations using outdated 2014 based ONS data, which results in a significant overestimate of housing needs.

I note that on 16 December 2020 the UK Government published its response to the local housing need proposals on the consultation on changes to the current planning system. This sets out important changes to the standard method which has been amended so that the 20 most populated cities and urban centres in England (none of which are in Dacorum) see their need uplifted by 35%. The Government also said:

"More broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We (Government) should be clear that meeting housing need is never a reason to cause unacceptable harm to such places. ...

Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt."

Failure to Provide Adequate Supportive Infrastructure

Looking at the proposed developments on Green Belt land, there is insufficient consideration in the Local Plan for the provision of new infrastructure or upgrading the current infrastructure to support the scale of the proposed developments.

Taking a specific example of transportation, consider area 'Bk01 - South of Berkhamsted'. This proposes adding 850 residential units with 2 ways out of the development:

1. Emerging immediately next to a secondary school of over 1300 pupils; and
2. Passing two primary schools on a single, narrow residential road with a 10% gradient and car parking on both sides.

These roads are heavily congested during normal times with the current population – the road by the secondary school backing up during school run times to the main A41 route into and out of the town. Adding 850 households of cars will lead to transport paralysis for the new residents, the homes already in the area, pupils of the schools and people trying to access Berkhamsted from the A41 during peak times.

Similarly, increasing the number of dwelling by over 1,800 in the Berkhamsted area will result in a considerable increase in vehicular traffic through the centre of the town – a route that is already heavily congested at peak times at the A4251 / A416 junction and along the High Street. This is due to the historic layout of the town along a valley with steep sides meaning there are only these two roads into and through the town.

For the increase in population proposed in the Local Plan, there would need to be a considerable extra investment in road widening, traffic flow control measures and new roads to bypass the congestion points inherent with a medieval market town situated in a steep river valley.

Impact on Green Belt and Other Designated Land

The Local Plan states that a key objective is "minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB". This strategic principle is then violated by the declared mission to provide at least 100% of the Council's self-assessed housing need, regardless of the impact on the environment, infrastructure, climate change and biodiversity.

Noting that 85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns AONB, this approach comes at considerable environmental cost.

As such, the Local Plan must be fundamentally reworked to avoid such contradictions in strategic goals and principles.

You are now faced with a personal choice.

Whether to be remembered for taking the easy choice and sticking to an inherently flawed plan that will deeply damage the Borough of Dacorum forever – your lasting legacy – or to take the brave decision and do what is right – to reject the current plan and come back with one based on the actual needs of the current and future voters and households of Dacorum.

Included files

Title Question: Evidence Base

ID EGS4592

Person ID 1145918

Full Name Mr Richard Tregoning

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

The evidence base is out of date flawed and a reaction to Governemnt imposed targets which Government have now withdrawn

The UK strategy to hold population growth to less than 5% in the plan period 2020 to 2038.

DBC has not studied the core Government strategy and should withdraw all plans until a reasoned set of statistics can be used.

A Plan is necessary but it needs to be based on fact not fantasy

Included files

Title Question: Evidence Base

ID EGS4630

Person ID 1264481

Full Name KEITH AND LEAH RYDING / BREZOVEC-RYDING

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Incomplete infrastructure planning to support growth TheIDP fails to adequately address issues, including traffic, water and wastewater and merely allocates attention to the congestion point of the High Street and Kings Road. Without planning to redirect traffic from this junction Berkhamsted will experience greater traffic congestion issues.
Included files	
Title	Question: Evidence Base
ID	EGS4655
Person ID	1264487
Full Name	Mrs Sue Edmanson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	Q7 See comments included in responses above.
Included files	
Title	Question: Evidence Base
ID	EGS4694
Person ID	1145431
Full Name	mr David van Rhee

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS4736
Person ID	1263004
Full Name	Jill Townsend
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS4833
Person ID	1257705
Full Name	Mark Barfield
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS4844
Person ID	1264531
Full Name	PAUL KENT
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS4856
Person ID	1264475
Full Name	Simon Davies
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	I repeat my warning that the plan is out of date financially and economically due to the huge changes on working practices and retail caused by the pandemic. Complete reappraisal needs to be done now because of the danger of delivering a plan that is out of date now, and will be antique by 2032.
Included files	
Title	Question: Evidence Base
ID	EGS4875
Person ID	1264533
Full Name	MAURICE OKEEFFE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS4894
Person ID	1150594

Full Name	Catherine and Mark Richardson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>We consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS4912
Person ID	1264537
Full Name	KATHERINE COURTNEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	No

* No	
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS4916
Person ID	1264536
Full Name	Mr George Harvey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply</p>

seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS4930

Person ID 1264540

Full Name JOSEPH DAWSON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS4938

Person ID	1260771
Full Name	JAMIE BELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt</p>
Included files	
Title	Question: Evidence Base
ID	EGS4954
Person ID	1264546
Full Name	Dr Calvin Veeroo
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	No

* No	
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS4982
Person ID	1264548
Full Name	Mrs Sasha Godfrey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional</p>

circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files**Title** Question: Evidence Base**ID** EGS4997**Person ID** 1264549**Full Name** Mrs Kate Carter**Organisation Details****Agent ID****Agent Full Name****Agent Organisation****Yes / No**
* Yes
* No

No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files**Title** Question: Evidence Base**ID** EGS5084**Person ID** 1264258**Full Name** Fintan FitzPatrick

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published: <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan • Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers
Included files	
Title	Question: Evidence Base
ID	EGS5125
Person ID	1250013
Full Name	Mrs Nikki Bugden
Organisation Details	Clerk Nash Mills Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	We support concerns from CPRE that ONS data used could be more up to date (2018, rather than 2014) and that the Water Scoping Study used was produced in 2010 and likely contains some outdated information.
Included files	

Title	Question: Evidence Base
ID	EGS5245
Person ID	1264608
Full Name	Nicola Beadle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	

Title	Question: Evidence Base
ID	EGS5282
Person ID	1175740
Full Name	Berkhamsted Schools Group
Organisation Details	The Berkhamsted Schools Group
Agent ID	1175743
Agent Full Name	Kevin Rolfe
Agent Organisation	Group Director, Development & Planning Aitchison Raffety
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<i>Yes, subject to comments below</i> We have analysed the very comprehensive raft of evidence base documents.

We reiterate that there is clearly detailed work to be done on the IDP as the draft plan progresses. Further detailed work will be necessary on transport /highway interventions as per the Aecom reports and in particular the costs and funding/viability.

Once the plan passes to the next phase, we would wish to engage in detail with DBC officers to identify what infrastructure is fair and appropriate for BK03, also having regard to existing CIL and other funding sources. Also, BSG is using the receipt to invest directly in education provision; sports provision plus wider road/infrastructure improvements on an ongoing basis.

Included files	
Title	Question: Evidence Base
ID	EGS5314
Person ID	1264532
Full Name	Robert Clarke
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	This plan is now out of date and should be completely reconsidered in the light of present circumstances following Covid 19
Included files	
Title	Question: Evidence Base
ID	EGS5330
Person ID	1262731
Full Name	Julie Battersby
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>There has been insufficient time available in this consultation for me to consider all the supporting evidence. The consultation should be reviewed and re-released with a longer response period. My initial thoughts are:</p> <p>The evidence base would benefit from a full ecological survey of the chalk rivers and the impact of the proposed development, including the wider catchment. It must address how sufficient water is to be supplied and provide a tangible time-scale of key supply events.</p> <p>The evidence base would also benefit from an evaluation of the development proposals in the context of parts of Dacorum becoming part of a future National Park and any considerations that should be specifically included in to support or prepare for National Park status</p> <p>The evidence base would benefit from a detailed ecological study of all main wildlife corridors and include recommendations regarding each proposed development site along their route. It should propose priority and strategic sites or parts of sites that should be conserved as critical parts of the wildlife corridor with recommendations as to how they could be enhanced to support specialist habitat and vulnerable wildlife rather than simply relying of 'increasing biodiversity'. The true measure of biodiversity should be measure across the Borough as a whole and be judged inthe context of national biodiversity targets.</p> <p>The evidence base regarding population size and growth and therefore housing need is entirely out of date and the consultation should be halted and revised after the census when more recent and reliable information will be available.</p>
Included files	
Title	Question: Evidence Base
ID	EGS5343
Person ID	1264616
Full Name	Philip Daw
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Evidence Base comment	The Council is using outdated (2014) housing projections. The 2018 ONS data should be used. The number of houses proposed will put significant pressure on the current infrasture i.e. GPs, hospitals, schools.
Included files	
Title	Question: Evidence Base
ID	EGS5381
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	is it up to date?
Included files	
Title	Question: Evidence Base
ID	EGS5394
Person ID	1262255
Full Name	AJ W
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	It is a weighty tome but without substantial evidence. It does not address the genuine requirements of the borough and needs to be revisited, especially in light of a post pandemic post Brexit world that has changed the political and cultural landscape.
Included files	
Title	Question: Evidence Base
ID	EGS5437
Person ID	1258646
Full Name	Jane Timmis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The evidence base for the entire draft Local Plan is based on out-of-date (2014) data of housing need. It is over estimated by at least 40%. Therefore the evidence for the exceptional circumstances for building over approximately 2,000 acres of Green Belt land is not valid.</p> <p>A lot of work has been done in producing this plan but it is based on a false premise - the amount of housing need, and if executed as is, will overwhelm our existing communities, erase Green Belt never to be replaced and lead to a lot of lasting ill feeling and resentment.</p> <p>This not to say that there is no evidence of housing need</p>
Included files	
Title	Question: Evidence Base
ID	EGS5521
Person ID	1264647
Full Name	Richard Burnell
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS5565
Person ID	1264048
Full Name	Alison Fraser
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	We need to know what the impact of Brexit and Covid and a downturn in the economy will have on housing need. We may need more 'affordable' housing and less overall housing.
Included files	
Title	Question: Evidence Base
ID	EGS5579
Person ID	1264491
Full Name	Paul Wade
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Overall, I think it is unreasonable to ask members of the public to judge this
Included files	
Title	Question: Evidence Base
ID	EGS5714
Person ID	1262957
Full Name	Gregory Hukins
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS5736
Person ID	1264678
Full Name	Tom A
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: Evidence Base
ID	EGS5801
Person ID	1144878
Full Name	Mr Peter Moore
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The complete Evidence Base should be reviewed to incorporate the economic and societal impact and consequences of the pandemic upon Dacorum's plan.
Included files	
Title	Question: Evidence Base
ID	EGS5891
Person ID	1264761
Full Name	Sarah Durant
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Dacorum Borough have chosen to accept Central Government imposed growth figures that are not substantiated by evidence and are based upon outdated ONS projections and an arbitrary and simplistic algorithm. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% FEWER than this plan projects. The plan does not address the overwhelming evidence that any development must be carbon neutral, it degrades our natural environment when the pandemic has shown us more than ever the importance of access to green spaces - and the increase in footfall has also show the fragility of our local nature reserves and that they cannot support the existing population - let alone the proposed increase in the population in the plan. Any increased population necessarily requires a concomittant, or greater, increase in nature reserves. This is not included in the plan. The plan needs to be thrown out and completely rethought.
Included files	
Title	Question: Evidence Base
ID	EGS5902
Person ID	1263498
Full Name	Peter Reynolds
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I do not believe that the target of c. 17,000 new houses in Dacorum is supported by the evidence having regard to latest ONS figures and previous Dacorum BC projections.
Included files	
Title	Question: Evidence Base
ID	EGS5931
Person ID	1261255

Full Name	Sarah Lightfoot
Organisation Details	
Agent ID	1261248
Agent Full Name	Sarah LIGHTFOOT
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	BRAG makes important comments relating to this which I endorse.
Included files	
Title	Question: Evidence Base
ID	EGS5939
Person ID	1264752
Full Name	Chris Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>DBC has used outdated (ONS 2014) housing projections, whereas it is required to use the most recent and relevant ONS projections (2018) so I do not agree that the Evidence base is adequate, up-to-date and relevant.</p> <p>Please see Topic Paper 'Development Strategy November 2020': this tracks the history, marshals the data and argues that the dwelling numbers for the Reg18 Plan meets the housing needs for the Borough viz 922 [or recently 1023] pa. I don't believe this is the correct basis for the Plan – which is based on 'national requirements' rather than local needs.</p> <p>The data below is drawn from reliable sources e.g. ONS and the study commissioned by the Districts' Joint Housing Needs Assessment quoted in the Plan.</p>

The current dwelling numbers established in the Adopted 2013 Core Strategy sets an annual build rate of 430 pa. The Data shown in Fig 2 Housing Trajectory 2020 – 2038 [p 38] records anticipated completions across the Borough for 2020/21 as 654 and 21/22 as 1036. These are **well in excess** of the Core Strategy and also the numbers projected by ONS.

The numbers set for the Draft Plan have been based on the ONS projections of housing ‘need’ but manipulated by a formula adopted by MHCLG to determine the ‘national requirements’ stated in Para 6.7 above.

Dacorum

ONS projection of Dacorum annual housing growth

After adjustment by MHCLG algorithm

After adjustment by MHCLG algorithm

ONS 2014

730

1023 [new standard applied]

ONS 2018

355

922 [mutant applied]

497 [new standard applied]

As a result, I object to the adoption by DBC of the Ministry’s numbers: a lesser number to meet the assessed local needs must be agreed upon. This must lead to a revision of the site allocations and a new Plan.

Included files	
Title	Question: Evidence Base
ID	EGS5956
Person ID	1262737
Full Name	Andrew Cassels
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Assessment of environmental damage to ecosystems and pollution of the atmosphere require urgently reassessed.
Included files	
Title	Question: Evidence Base
ID	EGS5979
Person ID	1151388
Full Name	Mrs Aileen MCVEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS6011

Person ID	1264809
Full Name	Sue Selfe
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS6028
Person ID	1264822
Full Name	JULES GARNER
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I can not understand why such an important decision is relying on out of date information (2014 Office of National Statistics) when there is already up to date information from the Office of National Statistics from 2018. This is such an important decision why are we not using the right data? If we were, we would see that the expansion proposed is almost double the potential requirement. Again this doesn't make sense given the impact on the environment.
Included files	
Title	Question: Evidence Base
ID	EGS6069
Person ID	1264657
Full Name	Amanda Hutchinson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>There is little evidence that the council have considered how to give the Green Belt the protection required by the NPPF. There is little to suggest that local opinions and experience have been given due weight. Consultants cannot replace experience of living in a place. There is no attempt to ask what new housing is actually required in Dacorum. The Government methodology for calculating housing needs should be adapted to the local area, not applied blindly. Birth rates are falling and the current pandemic has led to a large number of excess deaths but neither of these facts are considered. The 2018 ONS data, with standard methodology applied, leads to a figure of 497dpa not the 1023dpa being used. The current proposals therefore vastly overestimated the new housing required and unnecessarily reduce the Green Belt. Tough immigration policies and the fact that many European nationals are leaving as the effects of Brexit are felt means that even the lower figure may well be in excess of what is actually needed.</p> <p>There are inaccuracies within the main consultation document which exaggerate the green space by showing land already developed as open space and including private garden space as open land. It is at best misleading to show</p>

sports fields, private tennis courts and enclosed football pitches, all of which are inaccessible to the general public, as open land. It distorts the true picture of open space within the borough.

Average windfalls are inexplicably projected at 133.8dpa (Table 2) whereas they have averaged 346.3dpa over the past 5 years. No explanation is given for this discrepancy.

Included files

Title Question: Evidence Base

ID EGS6292

Person ID 1264834

Full Name Ilina Jha

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment Nearly 95% of respondents to the 2017 consultation didn't agree with the proposed approach to Green Belt and Major development sites, but there's little evidence that the council have explored how to give the Green Belt the protection that it needs.

Included files

Title Question: Evidence Base

ID EGS6374

Person ID 1264946

Full Name Shaun Pope

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes	
* No	
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS6419
Person ID	1264750
Full Name	Neil Joyce
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
QUESTION: Evidence Base comment	Any evidence collected prior to the 2020 pandemic should be re-evaluated in light of the shift towards home working and the impact that has on transport demands.
Included files	
Title	Question: Evidence Base
ID	EGS6432
Person ID	1264964
Full Name	Philip Heaphy
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
QUESTION: Evidence Base comment	<i>We do not believe that the target of c. 17,000 new houses in Dacorum is supported by the evidence having regard to latest ONS figures and previous Dacorum BC projections.</i>
Included files	
Title	Question: Evidence Base
ID	EGS6475
Person ID	1264982
Full Name	Rachel Heaphy
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<i>We do not believe that the target of c. 17,000 new houses in Dacorum is supported by the evidence having regard to latest ONS figures and previous Dacorum BC projections.</i>
Included files	
Title	Question: Evidence Base
ID	EGS6543
Person ID	1263462
Full Name	Bourne End
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	No

* No	
QUESTION: Evidence Base comment	The evidence base is incomplete, for example yet to be produced are: Climate Change and Sustainability SPD, Detailed Design Guide SPD, Climate Change Strategy and Action Plan.
Included files	
Title	Question: Evidence Base
ID	EGS6617
Person ID	494770
Full Name	Mr John Borton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	I object strongly to the Council's designation of private gardens and fenced off football and hockey pitches and school grounds as being 'open land'. These areas are off limits to the public and it is misleading of the Council to present such areas as Open Spaces
Included files	
Title	Question: Evidence Base
ID	EGS6642
Person ID	1265007
Full Name	Duncan Brown
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS6661
Person ID	1264920
Full Name	Anna Wellings Purvis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The evidence base is likely to be out of date following rapid demographic change, that is people moving to the EU to follow jobs or preserve EU citizenship, and the increase in deaths in the past 12 months. After years of increasing population, there has been a decrease.</p> <p>I hope the most up to date studies of air quality impact on childhood asthma, lung cancer and educational achievement have been considered, as I do not see evidence of this plan offsetting the increased pollution of building in the selected areas.</p>
Included files	
Title	Question: Evidence Base
ID	EGS6707
Person ID	1264923
Full Name	Ken Douglas
Organisation Details	Secretary

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The Evidence Base is either inadequate in several areas, not fully up to date, or presents significant data that are not explicitly addressed in the Local Plan.</p> <p>Topic Papers. Chilterns Beechwood SAC Summary and Appendices 1 to 26</p> <ul style="list-style-type: none"> • There are 100s of pages evidence about the significant importance of SSSIs etc. Tring is surrounded by SSSIs and other important wild spaces (5 out of 9 Dacorum SSSIs border Tring with a sixth just outside in Buckinghamshire). However, in the Local Plan special attention is given only to the Ashridge portion of the Beechwood SAC. • Appendices 25 and 26 are provided by the Woodland Trust. The significance of this land (which actually contains three SSSIs and not the one implied in the overarching document) and the impact of proposed developments are not reflected in the LP. There is also no consideration given to the adjoining woodland in Buckinghamshire. <p>Topic Papers. Site Selection section 2.20</p> <ul style="list-style-type: none"> • Where it has been concluded that land is required to be released from the Green Belt, the NPPF makes clear that compensatory improvements must be made to the environmental quality and accessibility of remaining Green Belt land. <p>There is NO explicit reference to how this will be achieved in the Local Plan.</p> <p>The Evidence Base is either inadequate in several areas, not fully up to date, or presents significant data that are not explicitly addressed in the Local Plan.</p> <p>Topic Papers. Chilterns Beechwood SAC Summary and Appendices 1 to 26 https://www.dacorum.gov.uk/docs/default-source/strategic-planning/topic-paper-for-the-chilterns-beechwoods-sac---summary-of-evidence.pdf?sfvrsn=d9da0c9e_4</p> <ul style="list-style-type: none"> • Extensive evidence is presented about the significant importance of SSSIs and other protected areas. More than any other town in Dacorum, Tring is surrounded by SSSIs and other important wild spaces (5 out of 9 Dacorum SSSIs border Tring with a sixth just outside in Buckinghamshire). However, in the Local Plan special attention is given only to the Ashridge portion of the Beechwood SAC • Appendices 25 and 26 are provided by the Woodland Trust. The significance of this land (which actually contains three SSSIs and not the one implied in the overarching document) and the impact of proposed developments are not reflected in the LP. There is also no consideration given to the adjoining woodland in Buckinghamshire.

- Where it has been concluded that land is required to be released from the Green Belt, the NPPF makes clear that compensatory improvements must be made to the environmental quality and accessibility of remaining Green Belt land

There is NO explicit reference to how this will be achieved in the Local Plan.

Included files

Title Question: Evidence Base

ID EGS6838

Person ID 1265036

Full Name Tom Burrows

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

Included files

Title Question: Evidence Base

ID EGS7007

Person ID 1263321

Full Name TSEL Secretary TSEL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No	
QUESTION: Evidence Base comment	Tornadoes observes that whilst there is an evidence base, that is relevant and, at present is up-to-date, the ongoing challenge for DBC is how it maintains the relevance and currency of the evidence base. To illustrate the point, DBC Playing Pitch Strategy 2019, DBC Indoor leisure Facilities Assessment 2019 and DBC Local Football Facilities Plan 2020 are all already out-of-date and as of this Local Plan Consultation no progress has been made on actually implementing any of the requirements, actions or recommendations. And, all of these are before the proposed increase in housing and population for Tring is taken into account.
Included files	
Title	Question: Evidence Base
ID	EGS7065
Person ID	1263561
Full Name	Alexander Bhinder
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	Too late to elaborate.
Included files	
Title	Question: Evidence Base
ID	EGS7107
Person ID	1265144
Full Name	Michael Williams
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.</p> <p>The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.</p> <p>The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.</p> <p>Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date information.</p>
Included files	
Title	Question: Evidence Base
ID	EGS7155
Person ID	1265133
Full Name	Sarah Storey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	This is the fundamental flaw with this plan. There is no justification for using out of date ONS housing estimates or for concentrating development in market towns such as Tring and Berkhamsted.
Included files	
Title	Question: Evidence Base
ID	EGS7275
Person ID	1261685

Full Name	Ian Edwards
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS7295
Person ID	1265179
Full Name	JANE DAWSON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional</p>

circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS7315

Person ID 1265182

Full Name JAMES NODDER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

Included files

Title Question: Evidence Base

ID EGS7316

Person ID 1265182

Full Name JAMES NODDER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

No

QUESTION: Evidence Base comment	<p>I understand the plan is based on a ONSsurvey of 2014 which determined 1000 houses per year were needed to meet demand.</p> <p>However I have also been informed that a more recent up to date ONS survey of 2018 revised this figure down to about half this number.</p> <p>This casts significant doubt on the validity of these proposals.</p>
Included files	
Title	Question: Evidence Base
ID	EGS7333
Person ID	864107
Full Name	Mr Antony Hetherington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>

Included files	
Title	Question: Evidence Base
ID	EGS7344
Person ID	1207259
Full Name	Mr Graham Bright
Organisation Details	Chairman Grove Fields Resident Association
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS7349
Person ID	1262256
Full Name	Sarah Marshall
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS7400
Person ID	1262537
Full Name	Josephine Horder
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS7411
Person ID	1265377
Full Name	PHILIP MOORES
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>I strongly believe that the underlying data used for this Local plan is not adequate, up to date or relevant. The evidence needs to be thoroughly reviewed as a result of the material impact of the COVID-19 pandemic. There can be no doubt that the future behaviour of residents in Dacorum both existing and potential will have been significantly changed by the pandemic and this material change needs to be reflected in any new plan for the borough.</p> <p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS7424
Person ID	1265380
Full Name	JON WRIGHT
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS7436
Person ID	1265381
Full Name	DR SUE DAVEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and</p>

contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS7500

Person ID 1265562

Full Name ALICE WILNE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* **Yes**

* **No**

QUESTION: Evidence Base comment

I am writing to object to the proposed local plan.

I find it shocking and disturbing that the Council is looking to change so dramatically the size and therefore nature of our local towns.

Having grown up in the area and gone to school in Tring, I now live in Berkhamsted with my family. I value the character of these market towns and the amazing natural beauty of the surrounding countryside.

I find it very difficult to reconcile how there can possibly be a demand for the level of housing proposed. The statistics on which these numbers are based appear to be already many years out of date and on any basis clearly do not take

account of the changes which the pandemic will undoubtedly have on housing needs. The local towns are currently very much in the commuter-belt for London with the inevitable knock-on effect on house prices. With more people working more often from home in future, it is widely considered that people will also look to locate much further out from London. It seems premature to put in place a Local Plan for such a drastic increase in house building before the true impact of the pandemic on working lifestyles and housing needs is known. Given the pace of change in businesses already in the last year, a delay of only a few years may be all that is necessary to get a better handle on what the local area's housing need actually is going to be over the next 10-20 years.

I am also particularly concerned about the impact on the local environment. I am shocked to learn that it is even possible to build on green belt land and dismayed at how much of it is proposed to be sacrificed for "growth". The impact that such an increase in the local population will have on the surrounding countryside will surely be immense and in particular will increase the need for water extraction from the aquifer which will threaten the upper reaches of the rivers Gade and Bulbourne, and is likely to leave these dried out to nothing.

Finally I consider the way this consultation has been conducted is simply inadequate. We received for the first time today - 25 February - a leaflet through the post with some details of the Local Plan from the Council. This is for a consultation which apparently opened on 27 November 2020 and is to close in two days' time. Fortunately I had recently been alerted by a friend to do my own reading on the plan but I am concerned that many in the local community may not have been aware of the plans until this late stage or even now.

I am also submitting this objection by email as the online portal for doing so is so unwieldy. How anyone who is not online or computer literate is supposed to respond to the consultation I don't know. Limiting the ability to respond to this format must surely be excluding a sizeable proportion of the local population.

I hope that the Council will reflect and accept that this plan needs to be delayed until there is greater clarity on the likely impact of the pandemic. In the meantime the opportunity could be taken to consider further the environmental impact and in particular the purpose and precious nature of the green belt. Once it has been built on, we won't get it back.

Included files	
Title	Question: Evidence Base
ID	EGS7544
Person ID	1145685
Full Name	Mrs Moira Graham
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	The information available seems to be hugely overpowering and you need a degree in town planning to find and understand the information needed - perhaps deliberately confusing.
Included files	
Title	Question: Evidence Base
ID	EGS7583
Person ID	1265614
Full Name	JACKIE BARKER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation</p>

is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS7612

Person ID 1143218

Full Name Mr Terry Cartmell

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS7624

Person ID 1207710

Full Name	Penny Bennetts
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I agree we need some more homes but I strongly disagree with the proposed number of homes which is grossly in excess of the latest ONS data which suggests less than 7,000 new homes will be needed in Dacorum by 2038.
Included files	
Title	Question: Evidence Base
ID	EGS7634
Person ID	1265747
Full Name	STEPHANIE BRADLEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>I would like to make the following points:</p> <p>To hold such a detailed plan consultation in the midst of a worldwide pandemic is questionable. People are far more focused on other issues crucial to their survival and have been over the past year. This is borne out by the tiny number of responses you have received.</p> <p>The plan was presented in a way that was not user friendly, salient points were not easily picked out, even by those who are highly educated, let alone those are not. This type of plan should be presented in a clear and concise but fully explicit</p>

manner such as an exhibition, with displays that are accessible to all (clearly not possible in a pandemic), for all areas of Dacorum.

The response portal is not at all user friendly and has put many people off responding.

The plan and consultation was not widely advertised and only after much petitioning about this point was literature sent to every household. The literature sent was wholly inadequate and set to mislead about some of the most important (and controversial) points in the plan.

The pandemic has resulted in massive changes in lifestyle and these are not reflected in the plan, therefore it should be revised in light of these major changes to how we live and work.

It makes no sense to use the 2014 ONS figures with the incorrect algorithm when more realistic projected numbers can be based on the more recent 2018 projections. Using the 2014 figures does not provide an “objectively assessed need”. Consequently the numbers projected are far too high.

Villages will cease to be self-sustaining and become car-linked hubs to the main towns.

Social housing needs for the area will not be met by this plan.

The projected use of greenbelt land should not be pursued and the greenbelt should be protected. Alternative locations must be sourced as a priority and the greenbelt protected.

There is no mention of the Glover report which proposes that the AoNB becomes a National Park. This plan goes against this report.

Climate Change considerations are key. The plan does not address how house building and subsequent use, transport and infrastructure will align with the Government 2025 net zero target. The carbon cost of using greenbelt land is key.

Many of the documents referenced are in draft form and not up to date., including the habitats assessment (2006). There are no Habitats Regulations Assessment Documents .

Biodiversity value change assessments should be included and verified independently.

Most of the developments will be taken by commuters rather than locals as not affordable for locals. Priority and affordability for locals should be key.

Inadequate transport and infrastructure: Provision must be made for sustainable transport from existing and new developments. Most of the new developments are out of town and the car cannot be prioritised for travel to stations (most of these developments will be for commuters and few locals). Bicycle travel must be prioritised. I am too scared to cycle on the roads. My husband has had 3 serious accidents (broken collarbones twice) due to potholes.

The people of Dacorum must have this plan explained to them so that they can understand the full impact of the plan proposals and hopefully realise that it is highly detrimental to future generations and can challenge it accordingly. Having spoken to them, almost all of my friends have no real idea about any of it and the seriousness of it.

The points above should be addressed and the plan put out for consultation in a correct manner once the world returns to some sense of normal... our future depends on it.

Included files

Title

Question: Evidence Base

ID

EGS7642

Person ID

1265748

Full Name

Mr Roger McVey

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

No

* Yes

* No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and

contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS7657

Person ID 1265752

Full Name Mrs Flora Moores

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment

I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local policies requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title	Question: Evidence Base
ID	EGS7676
Person ID	1261784
Full Name	Nigel Vanner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS7679
Person ID	1250022
Full Name	Mr Michael Ridley
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>7 The NLP is incomplete</p> <p>There are references in the NLP to policies that have yet to be produced, and without these the public should not yet be consulted on the NLP.</p> <p>Specifically:</p> <p><i>Climate Change and Sustainability SPD</i> <i>Detailed Design Guide SPD</i> <i>Climate Change Strategy and Action Plan</i></p>
Included files	
Title	Question: Evidence Base
ID	EGS7689
Person ID	1265757
Full Name	JENNIFER GAIL FREER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<ul style="list-style-type: none"> • Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely. • There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as 'protect', 'growth' and 'renewal' areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.

- The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.
- There is no agriculture strategy

Included files

Title Question: Evidence Base

ID EGS7701

Person ID 1265614

Full Name JACKIE BARKER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

No

QUESTION: Evidence Base comment

I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS7716

Person ID 1265765

Full Name Miss Inma Rodriguez

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS7743
Person ID	1265778
Full Name	Councillor Lara Pringle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment

—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.

— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.

— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB. This is of particular concern in Northchurch which is overlooked by the AONB - the built up part of Northchurch village currently dips into the Bulborne valley, such that there is an uninterrupted view of rolling countryside from the top of BK06. With a housing development here, there will be a permanent blight on the view from the AONB. This does not appear to have been considered by those drawing up this plan. The failure to recognise Northchurch as a separate entity to West Berkhamsted and references to the urban part of Northchurch really do indicate a lack of insight into the rural setting of Northchurch - it really is not just the edge of Berkhamsted, but a place in its own right. Limiting the settlement to its position of on the valley floor, really is crucial to maintaining the views from the surrounding AONB and green belt areas.

— There is no agriculture strategy. BK06 has been farmed for as long as I can recall. I have lived in Northchurch for 20 years and know that it has been ploughed every year. I walk my dog there regularly. In lockdown, the perimeter of this field was one of the limited areas that people could walk whilst maintaining distance due to the narrow pavements in Northchurch.

Included files

Title Question: Evidence Base

ID EGS7756

Person ID 1146062

Full Name Mr Jon Salmon

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes

* No	
QUESTION: Evidence Base comment	<p>Please take this email as my formal response to the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Consultation.</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the consultation. To avoid repeating the extensive points made in their response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>There are many reasons why I object to the Dacorum Local Plan, including its destruction of our vitally important Green Belt and the lack of infrastructure to support it. In addition, I think the number of proposed developments across Dacorum is excessive and I question the formula used to calculate it.</p>
Included files	
Title	Question: Evidence Base
ID	EGS7820
Person ID	1265909
Full Name	Peter Evans
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>Whereas the Local Plan gives special attention to the Ashridge portion of the Beechwood SAC, little specific attention is paid to the other SSSI's which border Tring (and another which is just outside in Buckinghamshire). No consideration is given to the adjoining woodland in Buckinghamshire. The impact of proposed developments on these areas are not reflected in the Local Plan.</p> <p>If it is concluded that Green Belt land should be released for housing, the NPPF makes it clear that improvements must be made to environmental quality and accessibility of remaining Green Belt land. There is no detail/commitment to how this would be achieved within the Local Plan.</p>
Included files	
Title	Question: Evidence Base

ID	EGS7838
Person ID	1265915
Full Name	Mr Stephen Trueman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS7891
Person ID	1265985
Full Name	PAUL ELLERAY
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS7907
Person ID	1265991
Full Name	NICHOLAS MORGAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p>

— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.

— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.

— There is no agriculture strategy

Included files	
Title	Question: Evidence Base
ID	EGS7941
Person ID	1265997
Full Name	ROSE SHERIDAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	

QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS7958
Person ID	1266002
Full Name	ROXANNE RANSLEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Lacking information relating to biodiversity, traffic, change to home working and loss of high street shops.
Included files	
Title	Question: Evidence Base
ID	EGS7974

Person ID	1266006
Full Name	SUE ELLERAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS8000
Person ID	1266015
Full Name	SOPHIE WHITTON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored this has recommended that the Chilterns AONB becomes a national park we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS8029
Person ID	1266031
Full Name	EAMONN BRENNAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
QUESTION: Evidence Base comment	<p>Insufficient infrastructure to sustain high growth numbers</p> <p>The draft Infrastructure Development Plan (IDP) is woefully underdeveloped, which is very concerning given the 25% increased growth.</p> <p>The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all</p>

types of infrastructure services and facilities in Dacorum. The plan as proposed does little to address the improvements in infrastructure required to support the proposed increase in housing. In particular, there are concerns regarding the impact on water supply and waste-water disposal. The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020's under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer, despite it already assessed as being "over-abstracted".

Waste-water disposal is an area of particular concern in this area. In Potten End there are several houses that experience sewage backing up into their garden already.

Included files	
Title	Question: Evidence Base
ID	EGS8030
Person ID	1266031
Full Name	EAMONN BRENNAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>Major gap in transport plan between A41 and B440 (Leighton Buzzard Road)</p> <p>The Transport Plan contained in the DLP is incomplete, and I have serious concerns about an increase in traffic through Potten End. Tring is projected to grow by 55%, and Berkhamsted by 25%. There is also a major development to the north of Hemel, called the "Hemel Garden Communities", which will comprise 1,550 homes built over the next 17 years, and a further 4,000 afterwards. Also envisioned is a potential new link road from J8 on the M1 through the new garden community to the B440 (Leighton Buzzard Road). A reference is also made to this new link road being utilised by Tring and Berkhamsted residents to access the M1. However, there is <u>no consideration at all</u> given to how those residents get to the B440 in the first place. The obvious answer is via Potten End. This will lead to a considerable increase in traffic through the lanes of the village, not only because of the substantial growth of the adjoining settlements, but also because the changes in the Hemel Hempstead road layout will make it harder to access the A414/M1 through Hemel (reduction of lanes on the A414). This will funnel even more traffic onto cross-country lanes. This is particularly the case for HGV vehicles which are prohibited from coming from the north via Water End Lane and from the south through Warners End (via Galley Hill) – in both cases because of weight restrictions on the relevant roads. Potten End has seen a noticeable increase in this type of traffic over the past few years since those restrictions have come into force.</p>

Included files	
Title	Question: Evidence Base
ID	EGS8048
Person ID	1152837
Full Name	Suzanne Jannese
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The numbers are questionable. The government initially based the numbers on a formula now known as 'The mutant algorithm'. In December the government announced it would ditch this algorithm — many reasonably thought that the proposed numbers in the local plan would therefore fall. BUT THE GOVERNMENT CHANGED THE STATISTICS TO JUSTIFY THE NUMBERS ANYWAY — THE NUMBERS OF PROPOSED HOUSES HAVE THEREFORE INCREASED...
Included files	
Title	Question: Evidence Base
ID	EGS8073
Person ID	1266048
Full Name	RACHEL MORGAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	<ul style="list-style-type: none"> —Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely. There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape. The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB. There is no agriculture strategy
Included files	
Title	Question: Evidence Base
ID	EGS8193
Person ID	1207825
Full Name	Claire Hobson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>I am responding to the consultation on behalf of myself and the X adults who live with me.</p> <p>I gave up trying to use the portal as it was impossible to work through all the documentation to answer the questions - why wasn't a simple questionnaire set up, separate from the documentation? This is one of the worst examples of a system set up for the benefit of the people receiving and collating responses rather than making it easy for citizens to reply. This is an unacceptable barrier to responding.</p> <p>I have lived in Boxmoor for over 23 years, I went to senior school in Warners End and until the pandemic commuted to London daily. I brought up my family here and have loved being close to the town centre, the canal and plenty of green space that sets Hemel aside from many post war developments.</p>

My response lacks detail as there is far too much information to go through on top of an office job, caring for an elderly mother with dementia who has been unable to attend her days centre since April last year, two close relatives suffering from recent and historic trauma, running a small local business that has been busier due to more people working from home during the pandemic, and my role as a local councillor. The consultation is not very accessible or easy to digest on a screen, even for me an IT literate person who has a professional office set up at home, with a large screen/keyboard/mouse etc. For those who only have a tablet or phone it is impossible to engage in any meaningful way with the consultation. I apologise in advance for any typos - I am exhausted from all the extra work I have had to do in the pandemic due to public services being closed for a year and more people in the house and community to look after.

I am educated to MSc level, a former Senior Civil Servant, and am computer literate - for the avoidance of doubt when reviewing my complaints about how hard you have made it to reply and engage with the process for the citizens of Dacorum.

I urge councillors and officers to take a step back and put themselves in the shoes of residents when designing huge and life-changing consultations. This has not put the council in a good light. Some local councillors have taken to social media to publicise the consultation but there was very little from the council. This consultation should have been postponed or extended to beyond lockdowns and school closures to enable a full and open review and engagement with the whole community.

We support the responses of OneVoice, Chiltern Society and the Liberal Democrat Group, among others, so I will not seek to duplicate their detailed points here, but focus on the main points of concern for a long time resident of Boxmoor, a jewel in Hemel's crown.

Greenfield/greenbelt

The green belt should be protected at all costs, and brownfield sites prioritised over any permanent destruction of greenbelt land. The council has said in public council meetings that they will protect greenbelt to the death but this is not what the consultation says and this is what has enraged so many residents.

Housing requirement and council tactics (Q1)

Too many houses, too few affordable homes.

It is absolutely clear that the number of houses supposedly held to our temples is far far too many on any rationale and evidence-based up to date analysis. The plan is woefully short on ensuring a large proportion of social/affordable housing, which is what residents of Dacorum need. The council has failed its citizens by refusing to face up to the Government and push back on the numbers. To throw the pass to the community in the middle of a pandemic with a consultation that proposes an eye-watering and irrevocable destruction of greenbelt and increase in town sizes of Berkhamsted and Tring is incomprehensible. This is an incredibly risky strategy in the middle of a pandemic when you will not have reached a significant proportion of the community die to pandemic restrictions. There are still more people in Dacorum who don't know about the consultation or its life-changing implications than there are who do know. And of those who do know, how many of them will have the time or energy to reply substantively? Please, on behalf of your residents, fight back at the government figures and listen to us. To ignore any criticism as politically motivated blinds you to listening to what we have to say *as people who live here and will live here, hopefully alongside the next generation, for the rest of our lives*

- *decades* is rude at best and incredibly insulting and not in the interests of what's best for Dacorum at worst. Other councils have fought back, why didn't we? Why didn't you agree the tactics with the residents whose lives will be affected by the new Local Plan?

The evidence base for the number of houses needed in Dacorum should be the 2014 ONS numbers and not 2018.

London Road development

4 storeys max at the station.

Another case of the Council not appearing to listen...in the most recent consultation on the station development, the overwhelming response from residents was to limit any development to 4 storeys to protect the local scenery, including overlooking the ancient grazing land of Boxmoor Trust and the view of Roughdown common and the fields beyond from resident in the heart of Boxmoor village. Why does the current plan say '8 storeys or more'??? What is the point of consultation?

It is clear to anyone who lives in the immediate area or who travels along London Road to and from town and Apsley or the A41 that height is a given at the Plough roundabout and at the scarred land and buildings next to Aldi at the A41 Junction.

There is scope to develop the ugly brownfield sites along London road opposite the moor, eg around the old gas works and near the trainline between the A41 and the roundabout at Roughdown road.

The area between Roughdown Road and the station roundabout must remain low rise to protect the street scene as Hemel moves into more green land towards Box Lane. I will fight any proposal to have higher than 4 storeys along this stretch of road and at the station.

Who are the new homes for?

The original proposals for the station development showed apartments that were clearly for commuters, which would be certain to pull people from London into the areas and with inadequate numbers of affordable properties, would not help local people looking to get onto the property ladder.

Commercial/retail at the station

Lockdown has impacted local businesses heavily and the council should be very cautious about approving retail space at the station that could take business away from Boxmoor village centre or town centre, the latter having taken a huge hit from multiple lockdowns. With the town walkable for the majority of people who would live in starter apartments like those proposed for the station development and regular bus services to town, there is limited rationale to have a supermarket or too many restaurant or food businesses at the station location.

Sustainability/climate change

There is nothing in this plan to reassure me that we would have sufficient water to provide for all of the new homes, nor that the council is acting NOW on the climate emergency they declared. An emergency means taking action immediately and we have seen far too little action and too few ideas in this plan, contradicted by the destruction of the greenbelt etc.

The council has also agreed to protect the area's unique chalk streams which are essential to maintaining a balanced ecology. These are at risk now and adding too many more houses will impact them further.

The planned housing should be carbon neutral at worst and negative at best. The plan is woefully unambitious on this.

Infrastructure

The infrastructure plan lacks detail on how the roads and cycle lanes will be built/improved and designed to reduce car use. The council needs to be far more proactive, imaginative and positive about designing for a low carbon future and helping residents live in uncongested places.

In summary

There is insufficient evidence of housing need to support the level of development (Q8). Full exploitation of brownfield sites for the Local Plan is not fully evidenced. So the Plan fails to meet Section 137 of the NPPF, which specifies the exceptional circumstances that need to exist to justify changes to Green Belt boundaries.

PLEASE LISTEN TO US - use the citizen's panel and have one for each area in the plan so we can co-design housing, infrastructure and space together. No one knows the area and its needs better than the people who live here.

There are so many good people who work for the council and have worked so very hard on this plan but this proposal is cloth-eared, unambitious and risks ruining the lives and the enjoyment of Hemel and Dacourm's green spaces forever.

Included files

Title

Question: Evidence Base

ID

EGS8244

Person ID

1266155

Full Name

Annabel Carroll

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

No

* Yes

* No

QUESTION: Evidence Base comment

—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.

— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.

— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.

— There is no agriculture strategy

Included files

Title Question: Evidence Base

ID EGS8250

Person ID 1266156

Full Name Benjamin Roberts

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

Major gap in transport plan between A41 and B440 (Leighton Buzzard Road)

The Transport Plan contained in the DLP is incomplete, and I have serious concerns about an increase in traffic through Potten End. Tring is projected to grow by 55%, and Berkhamsted by 25%. There is also a major development to the north of Hemel, called the “Hemel Garden Communities”, which will comprise 1,550 homes built over the next 17 years, and a further 4,000 afterwards. Also envisioned is a potential new link road from J8 on the M1 through the new garden community to the B440 (Leighton Buzzard Road). A reference is also made to this new link road being utilised by Tring and Berkhamsted residents to access the M1. However, there is no consideration at all given to how those residents get to the B440 in the first place. The obvious answer is via Potten End. This will lead to a considerable increase in traffic through the lanes of the village, not only because of the substantial growth of the adjoining settlements, but also because the changes in the Hemel Hempstead road layout will make it harder to access the A414/M1 through Hemel (reduction of lanes on the A414). This will funnel even more traffic onto cross-country lanes. This is particularly the case for HGV vehicles which are prohibited from coming from the north via Water End Lane and from the south through Warners End

(via Galley Hill) – in both cases because of weight restrictions on the relevant roads. Potten End has seen a noticeable increase in this type of traffic over the past few years since those restrictions have come into force.

Included files

Title Question: Evidence Base

ID EGS8288

Person ID 1266170

Full Name Philip Hill

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

Please take this email as my formal response to Dacorum's Local Plan (2020-2038) Emerging Strategy for Growth. I do not agree that 16,000 houses should be in the plan and believe you should be using up to date figures which would halve that number to around 8,000 houses.

The current pandemic has shown how important our local green spaces are and that our green belt land must be protected. I do not believe that inflated housing need is an exceptional circumstance for removing Dacorum's green belt.

Green belt land helps protect the shape, size and character of towns and villages preventing them merging into one another.

This plan underestimates the potential for brownfield regeneration opportunities which have increased due to the pandemic with more people working from home.

The plan does little to address the improvements on infrastructure that will be needed to support 16,000 new houses. We currently have no hospital, functioning police station or sufficient schools & residents parking.

I understand that we don't have enough water to supply all the extra houses. I believe from what I have read that the extra water needed can only be extracted from the chalk aquifer which in turn will damage the borough's chalk rivers which are classified as priority habitats by the Natural Environment & Rural Communities Act 2006.

I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this

information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Evidence Base

ID EGS8295

Person ID 1266171

Full Name Patrick and Gillian Wilks

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

We wish to object to the plan for the following reasons.

- 1 Although emphasising green spaces the plan increases housing by 25% and uses 2000 acres of valuable Green Belt and open spaces across the borough. If Covid has taught us anything it is that Green spaces are vital and must be kept in our local community.
- 2 Impact on Green Belt & Chiltern area of Outstanding Natural beauty (AONB). The scale of the proposed housing will have a detrimental impact on the natural environment
- 3 Underestimating Brown field potential (Q2 of consultation). Although the plan includes some brownfield suites the major housing developments are on the outskirts of Hemel, Berkhamsted and Tring. The plan fails to take into account the impact of Covid and recent working from home changes; in the near future more office and work sites may become available.
- 1 Unsustainable development (Q3 of the consultation) Focusing building on the outskirts of the main towns means that the developments are some distance from existing transport infrastructure. This will result in several thousand more cars on local roads.
- 2 More congestion on the roads, particularly impacting Potten End. The plans suggest traffic coming from Tring and Berkhamsted would use the new link road in North Hemel from the Dagnall road (B440) to J 8 on the M1, rather than using the old link road through Hemel. This is so close, the new link road is an unnecessary addition. Also there is no way for the traffic to get to the A41 From the B440. The route would take you up through Potten End and then the narrow streets of Berkhamsted. The leight on buzzard road is often queuing in the rush hour times at

the moment especially to go over the bridge at Water End. The proposal would worsen this situation. It is unacceptable.

- 3 Water supply and waste water disposal (Q6) The chalk aquifer is already over abstracted and local residents are aware of the fragility of the water supply. The level of the new housing will put a severe strain on supply and disposal. There is the potential to damage the boroughs precious chalk streams. Dacorum and affinity water have recently spent time and money on improving the River Gade only for this plan to put it at risk.

We strongly object to the number of houses and the Motorway link proposed. The plan is based on figures the the government has now withdrawn. The plan should be based on the most recent ONS figures from 2018 which suggest a housing target for Dacorum of c. 500 houses pa, this is half the figure on which the plan is based.

Included files

Title Question: Evidence Base

ID EGS8318

Person ID 1266175

Full Name Anna Foster

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

The changes of housing target figures has changed. The Glover report which recommended that the Chilterns AONB becomes a national park has been ignored. There is no agriculture strategy. There is no excuse for using ONS statistics from 2014 instead of the most up to date ones!! It is not OK to say that you want to use the old figures (730 per annum) instead of the new ones (355) just because there has been 'significant change'. This is outrageous and shouldn't be allowed.

Included files

Title Question: Evidence Base

ID EGS8352

Person ID 1266200

Full Name ROGER HANDS

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>Looking at the ARUP Stage 2 Green Belt Review and Landscape Assessment the following comments are made.....</p> <p>Figure 4.2 is an incomprehensible scrawl which is supposed to represent a Sprawl Assessment... maybe this was not the final document?.</p> <p>Page 37 of the document has bullet points for absolute constraints for future land use change , one of which is Flood Plain however a number of the proposed development areas are in the flood plain. !!</p> <p>The assessment of whether a subarea meets the criteria seems to be very subjective. The rational behind the division into subareas is not explained . By dividing the green belt into so many sub areas it is easy to select one and say it fails to meet the criteria for no build, but what is not taken into account is the connectivity between these parcels of land. For the natural world connectivity is of paramount importance .</p> <p>Section 5.2.1 Functional Flood Plain :- The Chilterns chalk stream have historically been widened , deepened, straightened and moved. Much of the river is therefore no-longer connected to its natural flood plain. River restoration seeks to re-dress these changes in order to create a more natural river and one that will be more resilient to climate change. The planning process only seems to look at the functioning flood plain where it should be looking at the natural flood plain. By building on the natural flood plain the opportunity to restore a river will be lost as it will be argued that the restoration will increase the risk to the buildings which has been put up on the flood plain. With increases in the intensity of storm events as a result of climate change , rivers are likely to reclaim their natural flood plains meaning that costly flood defenses end up having to be built which may also be to the detriment of the river.</p> <p>The Housing Market Assessment document (Feb 2016) sets out the expected housing needs to 2036, but how will Covid 19 have changed these. We currently are expecting major changes to how people use high streets, with the loss of many retailers. Will the change in work practices (i.e. much more home working) change the housing need?</p> <p>Overall the planning documents show a lack of understanding of rivers, flood plain and how the inter connectivity between the river and its flood plain is of paramount importance. Additional housing will increase impermeable hard standing areas, increase runoff and increase the potential for polluted and silt laden runoff being discharged into the chalk rivers. This has a direct detrimental effect on the river and an indirect impact on the aquifer in terms of reduced percolation and potential for pollution.</p> <p>There also seems to be a lack of understanding with regards to the importance of connectivity to the natural world both fauna and flora. By building on bits of the green belt connectivity is lost and this issue needs to be addressed if building</p>

is to go ahead. Building on natural flood plain should not be considered at all, and future river restoration schemes included in the planning process as a matter of course. Mitigation for climate change needs to be much more prominent and the developers need to demonstrate clearly how this will be achieved.

Dacorum BC also needs to develop a clear policy on how they will mitigate for climate change, how it will reduce single use plastic, how it will positively assist in river restoration projects, how it will consider the wider aspects of the effect of building new houses such as increase runoff and reduced percolation, connectivity etc

Included files

Title Question: Evidence Base

ID EGS8366

Person ID 211117

Full Name Mr Michael Heylin

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * **Yes**
 * **No**

QUESTION: Evidence Base comment

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Figure 4.2 is an incomprehensible scrawl which is supposed to represent a Sprawl Assessment... maybe this was not the final document?.

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Section 5.2.1 Functional Flood Plain :- The Chilterns chalk stream have historically been widened , deepened, straightened and moved. Much of the river is therefore no-longer connected to its natural flood plain. River restoration seeks to re-dress these changes in order to create a more natural river and one that will be more resilient to climate change. The planning process only seems to look at the functioning flood plain where it should be looking at the natural flood plain. By building on the natural flood plain the opportunity to restore a river will be lost as it will be argued that the restoration will increase

the risk to the buildings which has been put up on the flood plain. With increases in the intensity of storm events as a result of climate change , rivers are likely to reclaim their natural flood plains meaning that costly flood defenses end up having to be built which may also be to the detriment of the river.

The Housing Market Assessment document (Feb 2016) sets out the expected housing needs to 2036, but how will Covid 19 have changed these. We currently are expecting major changes to how people use high streets, with the loss of many retailers. Will the change in work practices (i.e. much more home working) change the housing need?

Overall the planning documents show a lack of understanding of rivers, flood plain and how the inter connectivity between the river and its flood plain is of paramount importance. Additional housing will increase impermeable hard standing areas, increase runoff and increase the potential for polluted and silt laden runoff being discharged into the chalk rivers. This has a direct detrimental effect on the river and an indirect impact on the aquifer in terms of reduced percolation and potential for pollution.

There also seems to be a lack of understanding with regards to the importance of connectivity to the natural world both fauna and flora. By building on bits of the green belt connectivity is lost and this issue needs to be addressed if building is to go ahead. Building on natural flood plain should not be considered at all, and future river restoration schemes included in the planning process as a matter of course. Mitigation for climate change needs to be much more prominent and the developers need to demonstrate clearly how this will be achieved.

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Included files	
Title	Question: Evidence Base
ID	EGS8379
Person ID	1266205
Full Name	DI HAMMOND
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment

Looking at the ARUP Stage 2 Green Belt Review and Landscape Assessment the following comments are made.....

Figure 4.2 is an incomprehensible scrawl which is supposed to represent a Sprawl Assessment... maybe this was not the final document?.

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The assessment of whether a subarea meets the criteria seems to be very subjective. The rational behind the division into subareas is not explained . By dividing the green belt into so many sub areas it is easy to select one and say it fails to meet the criteria for no build, but what is not taken into account is the connectivity between these parcels of land. For the natural world connectivity is of paramount importance .

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Overall the planning documents show a lack of understanding of rivers, flood plain and how the inter connectivity between the river and its flood plain is of paramount importance. Additional housing will increase impermeable hard standing areas, increase runoff and increase the potential for polluted and silt laden runoff being discharged into the chalk rivers. This has a direct detrimental effect on the river and an indirect impact on the aquifer in terms of reduced percolation and potential for pollution.

There also seems to be a lack of understanding with regards to the importance of connectivity to the natural world both fauna and flora. By building on bits of the green belt connectivity is lost and this issue needs to be addressed if building is to go ahead. Building on natural flood plain should not be considered at all, and future river restoration schemes included in the planning process as a matter of course. Mitigation for climate change needs to be much more prominent and the developers need to demonstrate clearly how this will be achieved.

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Included files

Title

Question: Evidence Base

ID	EGS8416
Person ID	1266234
Full Name	LUCY DUGDALE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>> 7/ Do you agree that the evidence base that accompanies the plan is adequate, up to date and relevant?</p> <p>> —Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>> — There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>> — The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>> — There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS8441
Person ID	1266251
Full Name	ANTHONY TYRER
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Sustainability The Sustainable transport plan is poor in respect of Berkhamsted - because the proposal to build is at the top of the hill, where car journeys are the only feasible transport for most. This isn't very green and will then lead to further vehicle congestion in town which is already high at peak times.
Included files	
Title	Question: Evidence Base
ID	EGS8450
Person ID	1266276
Full Name	BARBARA ANSCOMBE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation. This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation

is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS8475

Person ID 495878

Full Name Ms Anna Hanson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

I have been informed from a number of sources that the Evidence Base is neither up to date or accurate.

The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.

The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.

The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.

Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date 2018 data.

Included files

Title Question: Evidence Base

ID EGS8485

Person ID 1266302

Full Name Gareth Garner

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I can not understand why such an important decision is relying on out of date information (2014 Office of National Statistics) when there is already up to date information from the Office of National Statistics from 2018. This is such an important decision why are we not using the right data? If we were, we would see that the expansion proposed is almost double the potential requirement. Again this doesn't make sense given the impact on the environment.
Included files	
Title	Question: Evidence Base
ID	EGS8502
Person ID	1266311
Full Name	Dr Gwynneth Down
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Whereas the Local Plan gives special attention to the Ashridge portion of the Beechwood SAC, little specific attention is paid to the other SSSI's which border Tring (and another which is just outside in Buckinghamshire). No consideration is given to the adjoining woodland in Buckinghamshire. The impact of proposed developments on these areas are not reflected in the Local Plan. If it is concluded that Green Belt land should be released for housing, the NPPF makes it clear that improvements must be made to environmental quality and accessibility of remaining Green Belt land. There is no detail/commitment to how this would be achieved within the Local Plan.

Included files	
Title	Question: Evidence Base
ID	EGS8516
Person ID	1265044
Full Name	Joseph Price
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS8527
Person ID	1266466
Full Name	Matt Leach
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	It is also clear that the Infrastructure Delivery Plan also contravenes Government policy. Aside from being woefully inadequate on all measures, it can no longer apply to how Dacorum's communities need to evolve. As such, the plan should be struck from the record and completely redrawn to acknowledge current policy and environmental targets.

I look forward to receiving acknowledgment of this objection and, of course, the revised plans.
 Please note, I expect the revisions to accommodate adequate schooling (primary and secondary) for any population increases.
 The borough is already woefully under-serviced.

Included files	
Title	Question: Evidence Base
ID	EGS8622
Person ID	1266595
Full Name	SHARON MACARTHUR-POWELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>7/ Do you agree that the evidence base that accompanies the plan is adequate, up to date and relevant?</p> <p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	

Title	Question: Evidence Base
ID	EGS8632
Person ID	1266604
Full Name	SEB BELOE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>7/ Do you agree that the evidence base that accompanies the plan is adequate, up to date and relevant?</p> <p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS8646
Person ID	1266607
Full Name	RACHEL POWELL
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS8663
Person ID	1248896
Full Name	Ashleigh Genco
Organisation Details	Harrow Estates plc
Agent ID	1258542
Agent Full Name	Samantha Ryan
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	The evidence base prepared to support the emerging plan is significant. Harrow has reviewed that information and considers that it is largely up-to-date, relevant and proportionate. However, the following are important omissions:

- A detailed Viability Appraisal to support the various allocations (including individual site requirements) and development management policies, particularly those setting development standards and requiring financial contributions. That information should be provided as soon as possible, enabling the various policies to be thoroughly tested to ensure that the various policy requirements are not so onerous as to make development unviable; this is particularly important in light of the significant requirements set out in the Infrastructure Delivery Plan and the various development management policies (see also response to Q.3)
- There is an urgent need for the council to provide a Habitats Impact Assessment. This is a statutory requirement and the plan cannot proceed until that important evidence is in place. It is particularly important in Dacorum to inform development plan policies relevant to the Chilterns Beechwoods SAC.

Included files

Title Question: Evidence Base

ID EGS8670

Person ID 1207333

Full Name Growth Team

Organisation Details Growth team
Hertfordshire County Council

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

Current situation and Context

Section 6 of the Childcare Act 2006 places a duty on all local authorities to secure sufficient childcare for working parents, or parent, who are studying or training for employment for children aged 0 to 14 (19 years for disabled children). HCC also has a statutory responsibility to provide universal Free Early Education (FEE) for 3 and 4 year HCC also has had a statutory responsibility to provide 15 hours FEE to eligible vulnerable 2-year-old children across Hertfordshire. An extended entitlement of an additional 15 hours free childcare was introduced for working parents in Hertfordshire in September 2017.

Provision of all the above entitlements are provided in schools, private and independent pre-schools, day nurseries and childminders. In addition to FEE places, HCC has a duty to ensure there are sufficient childcare places for 0 to 14-year-old

children (age 19 for children with special education needs E.N.D.) in pre-schools, day nurseries and out of school clubs, which can run either from school locations or other community facilities.

The county council currently RAG rates the sufficiency levels for 2, 3, and 4 FEE places and extended childcare entitlement in Family Support Service Family Support Service localities are mapped against LSOA boundaries and are based on settlements/populations.

The key data is measured as follows:

Green Sufficient Places Available (Provision largely matches family's needs)

Amber Near Sufficient Places Available (A gap exists which may give families difficulties in accessing provision)

Red Insufficient Places Available (A gap exists which may prevent families from accessing provision)

Children's Services (School Place Planning)

As a forward planning tool, the county council is using a tiered approach to calculating child yield arising from emerging local plan This tiered approach uses data from our pupil yield survey. It is considered that a tiered approach to pupil yield can reflect a more refined settlement-based strategy based on the forms of development likely to come forward in a specific area as follows:

Tiered Approach to Pupil Yield in Local Plans

Tier

Ratio

Description of development

1

1:400

These sites are typically greenfield sites with a dominance of houses (typically 80/20), a higher proportion of 3+ bed properties, and a higher proportion of detached or semi- detached houses.

2

1:500

These sites are typically PDL with a mix of houses and flats, and a higher proportion of terraced, maisonettes or flats. There is generally a 50/50 Split between smaller (1 & 2-bed) and larger (3-bed+) family homes and houses are most likely to be terraced.

3

1:1000

These sites are typically PDL with a dominance of 1 & 2 bed properties and are mostly flatted developments (at least 75% flats).

The tiered approach is used in order to estimate the child yield that could be generated by each respective The county council therefore considers this approach to be sufficiently robust to inform the borough council of the need for additional education provision within this Regulation 18 local plan consultation.

Specific comments in relation to additional education need is set out under the relevant policy and supporting text that accompanies each specific

Community Protection

Hertfordshire Fire and Rescue Services (HFRS) has five fire stations within Dacorum Borough:

Hemel Hempstead: This is a full-time fire station which has two permanently crewed fire engines and also houses HFRS Decontamination and Environmental Protection Unit (DEPU);

Kings Langley, Berkhamsted, Tring and Markyate: These are on call fire stations and each station houses a single fire engine and are crewed on a retained basis e. firefighters in the community respond to an alerter.

HFRS capacity to deliver an emergency response is not unduly affected by individual developments even if they are fairly However, the 'cumulative effect' of the allocations contained within the draft plan, along with further developments in neighbouring St Albans City & District will likely impact HFRS's capacity and place additional demand on fire and rescue resources. The predicted situation in and around the greater Hemel Hempstead area is leading towards a situation where HFRS's ability to continue providing a suitable response within our agreed timescales may be compromised.

HFRS may look towards the potential of dividing resources at the existing fire station in Queensway, Hemel Hempstead (which houses two fire appliances) into two fire stations (one fire appliance at each), one located at the far east of Hemel Hempstead, ideally on or about Junction 8 of the M1; and one in the west of Hemel Hempstead, ideally in the Aspley/Two Waters area. This will place additional demand in terms of the need for additional capital investment in new facilities and funding for additional equipment, and on revenue budgets for firefighters, officers and support staff. We would welcome further dialogue on this issue following this consultation.

HFRS will seek, where possible, planning obligations towards fire and rescue services via Section 106 agreements, along with the Community Infrastructure Levy (CIL). Contributions will be sought from schemes which have the potential to increase the demand on the service as currently provided across the borough, particularly as the impact potentially crosses two Dacorum and St Albans Local Planning

HFRS requests to be consulted on requirements for the provision of water supplies, e.g. suitable and sufficient water mains and hydrants. Fire hydrant(s) served by the mains water supply shall be provided prior to any dwellings being occupied and to the satisfaction of HFRS. It is also recommended that sprinkler systems and Automatic Water Suppression Systems (AWSS) are placed in all buildings and new developments, in order to form part of an integrated fire safety provision. The expansion of Hemel Hempstead provides an opportunity to apply a proactive approach towards protecting the community and infrastructure through in-built fire suppression systems and the inclusion of AWSS.

Lead Local Flood Authority. The South West Hertfordshire 2018 level 1 Strategic Flood Risk Assessment (SFRA), provides an overview of flood risk in Dacorum both currently and with an expectation that flood risk will increase due to the predicted impacts of climate This is a satisfactory evidence base for the initial consideration of flood risk in the Draft

Local Plan and it sets out the broad principles of how flood risk should be assessed and managed. The county council is pleased to see that the SFRA has been updated in May 2020 (addendum) and further updates should continue to be made, after adoption of the Local Plan, when required by improved knowledge or insights into flood risk.

It was noted that the most recent Level 2 SFRA is dated 2008. References in the draft Local Plan to Level 2 SFRA are assumed to refer to new or updated SFRA level 2 that will follow on from the October 2018 SFRA. The potential impact of flood risk is recognised in the draft strategy and there are appropriate policies for the treatment of flood risk impacting on development sites. Three suggested additions are as follows:

Reflect on the potential impacts of climate change and the need for adaptation across all of the policy areas in the document. This should include commentary on the benefits of integrated As an example, specifically for flood risk, it would include using management of flood risk to benefit water resources, the benefits of (blue) green infrastructure open spaces delivering multiple benefits eg SuDS, shade, supporting biodiversity, addressing heat island effects.

Consider if the principle of new development making a contribution to reducing existing flood risk and help with adaptation to predicted increases in flood risk as a result of climate change can be included in policy. Example would be to the west of Bovingdon and the south-west of Berkhamstead where development is proposed at the head of surface water catchments and where an appropriate drainage strategy could promote management of surface water on the site in a way that would benefit areas where there is flood risk lower down the catchment.

A more consistent approach to the tables in the section on Hemel Hempstead Garden Communities and Flood Risk and drainage does not appear in all of the tables eg. Growth Area HH03. If there are no known points to consider, then this should be stated. In the case where there is uncertainty about management of flood risk and drainage this should be stated. Other examples e.g. Growth Area HH18 refer to taking account of the SFRA level 2 (which has not yet been published) and further examples have site specific prescriptions e.g. Growth Area HH22.

Library Services

Provision of public libraries is a statutory requirement. HCC is committed to maintaining and modernising libraries across Dacorum to continue to meet the changing needs of service users and to cope with additional demand brought about by new development.

The Department for Digital, Culture, Media and Sport and the Local Government Association recognise that libraries change lives for the better and that they have a critical role in helping people to realise their potential, especially those from disadvantaged backgrounds. Libraries across Dacorum function as community hubs offering services and facilities to cater for a range of community needs including those of children, students, job seekers, and the They offer free, authoritative, non-judgemental information services and supported access to online resources and services, as well as providing access to books, DVDs, magazines, community language material, computers and the internet, an online reference service, ICT-based and other learning opportunities. They are neutral places that promote community health and wellbeing.

[HCC's Strategy for libraries](#)

Inspiring Libraries is HCC's ongoing strategy for the Library Service up to 2024. The strategy sets out the vision and direction for the service over a ten-year period and provides a framework for future decisions about service priorities.

The strategy is based on three main themes:

- The library as a vibrant community asset;
- The digital library; and
- The library as an enhanced gateway to reading, information and

The county council has the following policy ambitions and priorities for the next phase of the 'Inspiring Libraries' strategy':

- Improving library buildings
- Extending access to library services
- Developing technology
- Maintaining service delivery

HCC promotes libraries in three different tiers in order to clarify the services available to communities:

Tier 1 libraries are centrally located in large towns and offer the broadest range of stock and services, and the longest open hours. They are staffed by library staff; HCC invites volunteers to support the delivery of some services and activities. There is one Tier 1 library in Dacorum, this being Hemel Hempstead Library in The

Tier 2 libraries are located in smaller towns and provide core library services and a wide range of popular stock. Additional services are tailored to meet local need/demand. Tier 2 libraries are staffed during core hours; HCC seek to extend access through volunteer supervised self-service. There are two Tier 2 libraries in Dacorum, these being Berkhamsted and Tring Libraries, both based in the local town centre high streets.

Tier 3 libraries are located in smaller communities and villages and provide self-service access to library services, including the issue and return of books, access to computers/technology and study space and staff assistance via the LibraryLink service (video link to another library). HCC invites local communities to add value to these self-service facilities through volunteer support and the provision of additional activities and services as decided by the local There are four Tier 3 libraries in Hertsmere, these being Adeyfield, Leverstock Green, Bovingdon and Kings Langley Libraries

Future Library Provision in Dacorum

It is noted that the draft local plan provides for an increase of a total of 16,015 new dwellings across the borough, including 10,600 new dwellings in Hemel Hempstead, 2,200 in Berkhamsted and 2,700 in Tring. The number of libraries in Dacorum meets the current needs of the existing population and the county council has no plans to increase the number of service points in the borough.

However, it should be noted that any increase in the borough's population that arises arising from new developments that are likely to come forward from the site allocations contained within the draft local plan, will impact on library These include greater demand on adult and children's library stock, usage of public computers and other IT facilities and increased pressure on public circulation space within library buildings. New developments will therefore necessitate an increase in library service provision in order to take account of additional community demands arising from the draft local plan.

The county council will look to meet the increased library needs arising from the growing population by enhancing the existing provision at the tier 1 library in Hemel Hempstead as well as in Berkhamsted and Tring. The service may also need to increase capacity at Kings Langley and Bovington libraries, in order to allow for wider access to the residents of any new developments in these parts of the borough. Developer contributions will therefore be sought for service improvements appropriate to the scale and nature of proposed

In planning for any increased library provision to meet an increasing population, the county council will use established planning standards that are agreed nationally across the Public Libraries Sector. For example, there is a library standard which recommends the provision of 1,532 items per 1,000 population/average book price per person. These standards will inform the nature of any contributions that the county council will seek from developers to enhance the capacity of public libraries in Dacorum, in order to meet the needs of an increasing population.

YCH Services for Young People

YCH Services for Young People will continue to seek financial contributions for relevant projects where necessary, in order to ensure that support is available to young people in the Whilst Dacorum is a CIL charging area, Section 106 contributions will additionally be sought on larger, strategic sites where necessary.

Many young people using HCC services cycle to projects. The county council would be keen to see an improvement to the quality and continuity of cycling routes across Dacorum to encourage

Transport Evidence Base, Transport Topic Paper

Introduction (paragraph 1.2)

The package of interventions should focus primarily on encouraging the use of sustainable modes of transport, with priority given to improvements to walking, cycling and public transport over that of the private This will be important in achieving modal shift targets for the borough, and the text will need to be updated accordingly to reflect this.

Context

Text should be provided to introduce this chapter, as it just goes into talking about the transport Would be good to reorganise this chapter so that sustainable modes are outlined first and then the highway network described. By outlining the highway network first this gives the impression that this is more important than sustainable modes which it is not. More information also needs to be provided on the bus network across the borough as this has not be mentioned in the text.

Transport Vision for Dacorum

Hertfordshire Local Transport Plan 2018-2031 (paragraph 3.6)

Improvements to walking, cycling and public transport should be stated first and then improvements to highways. By outlining the highway network first this gives the impression that this is more important than sustainable modes which it is not as per the policies in HCC LTP4.

Hemel Garden Communities Transport Plan (paragraph 3.17)

It would be helpful to state here that more details on the potential interventions will be available once the transport work to develop a transport strategy (Stage 2) has been completed.

Current Movement Patterns Paragraph 4.2

As only Travel to Work data from the 2011 census has been used, the county council would question whether this gives an accurate picture of the current movement patterns across the For example, the data does not take into account other trips for different purposes such as education, shopping and leisure trips. Would also underestimate walking and cycling trips particularly for example those to train station etc. Might be an idea to investigate if there are any other data sources that could also be used for this analysis (e.g. Google Data and Strava Data)?

Walking (Tring and Berkhamsted)

With regard to the comment above in relation to other trips for different purposes such as education, shopping and leisure trips, it underestimates walking trips. Use of other data sources (e.g. Google Data and Strava Data)?

With regard to Figure 4-1, no detailed information has been provided in relation to movements within Tring and Berkhamsted as unlikely to walk between settlements and as such will give misleading results.

Walking (Hemel Hempstead)

With regard to the comment above in relation to other trips for different purposes such as education, shopping and leisure trips, it underestimates walking trips. Use of other data sources (e.g. Google Data and Strava Data)?

With regard to Figure 4-2, no detailed information has been provided in relation to movements within Hemel Hempstead as unlikely to walk between settlements and as such will give misleading results.

Cycling (Tring)

With regard to the comment above in relation to other trips for different purposes such as education, shopping and leisure trips, it underestimates walking trips. Use of other data sources (e.g. Google Data and Strava Data)?

Cycling (Berkhamsted)

With regard to the comment above in relation to other trips for different purposes such as education, shopping and leisure trips, it underestimates walking trips. Use of other data sources (e.g. Google Data and Strava Data)?

Cycling (Hemel Hempstead)

With regard to the comment above in relation to other trips for different purposes such as education, shopping and leisure trips, it underestimates walking trips. Use of other data sources (e.g. Google Data and Strava Data)?

After the walking and cycling analysis, there needs to be an analysis of the public transport data that has been done. There is a need to move sections on analysis of LENNON rail data and Bus Electronic Machine data to this

Summary of Key Mobility Issues (paragraph 4.38)

Need to use other data sources other than Travel to Work data from 2011 census as this may influence what the key mobility issues are as other trips for different purpose are missing and walking and cycling trips will have been

Planned Growth Sites

Hemel Hempstead (paragraph 5.40)

Although it mentions that growth is planned within the town centre, Two Water, West Hemel Hempstead and Marchmont Farm, it would be helpful to list details of the development sites in these areas as per Tring and

Implications of Growth Introduction

It is considered that this section is too detailed and would benefit from being simplified with the key

Paragraph 6.7

There is no consideration of walking and cycling trips in modelling and the overall impact that active travel modes can have in reducing car use. As active modes are not considered recommendations are likely to be highway-focused encouraging people to use the car. Although it is noted that the model outputs should not be the only means for identifying future transport measures it is not clear how active modes will be taken into account apart from a 'vision and validate'

Modelling Observations – Growth to 2036 (LP5)

Similar to the comments above, there is a lack of consideration for walking and cycling trips in

Modelling Observations – Additional Dacorum LP Run with Growth to 2036

Similar to the comments above, there is a lack of consideration for walking and cycling trips in

Provision of a new road to the north of Hemel Hempstead

There is a need to consider first the opportunities to maximise sustainable modes of transport and then determine the residual impact of vehicular traffic on the surrounding highway network using traffic modelling to see if additional highway capacity (i.e. a new northern corridor) is required. Based on the comments provided above sustainable modes of transport have not been taken into account in the

Modelling Observations-Impact of Growth (2036) on the Strategic Road Network

Similar to the comments above, there is a lack of consideration for walking and cycling trips in

Review of Emerging Transport Schemes Sustainable Transport Proposals

It should be noted that this is subject to transport work including Stage 2 of the Hemel Garden Communities work to develop a transport

Sustainable Transport Interventions

It should be noted that this is subject to transport work including Stage 2 of the Hemel Garden Communities work to develop a transport

Included files

Title Question: Evidence Base

ID EGS8801

Person ID	1261814
Full Name	Liz Uttley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>No, it is the case that there are multiple recent factors which have not been fully taken into account when preparing this plan. It is understandable, when considering that a Local Plan takes years to develop that more recent evidence is not always considered in full. However, there have been a number of changes of significance which must be fully considered before this plan is brought before the inspectorate.</p> <p>For example, most of the evidence base for this plan was produced prior to the onset of COVID. As a result, major changes that are expected in working and shopping practices have not been considered. It is also the case that the renewed appreciation and need for public open space has not been examined.</p> <p>A large proportion of the evidence base doesn't account for the recent update in Climate Change science, a dire warning from the IPCC in October 2018 which insisted upon an accelerated pathway to net zero.</p> <p>There have been a number of recent proposals by Government which if adopted, will have a significant impact on our planning system. One of these was the change to housing targets nationwide, which were changed again mid consultation, and another is the changes to permitted development and the proposed 'white paper', which will alter the core of our planning system. Under the proposals, land is to be categorised as 'protect', 'renewal' and 'growth' and much of the power in making planning decisions will be shifted away from the local authority and local people. If green belt is released, as proposed under this plan, these rules would mean a change for that land from 'protect' to 'growth' and this would result in a significant loss of planning influence for the council and our local community. To protect against inferior developments this potential change will need to be considered in detail.</p>
Included files	
Title	Question: Evidence Base
ID	EGS9063
Person ID	1267065
Full Name	M BALAC
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Also, there have been reports in the press that the data the plan is based on is now outdated and is therefore void . I would like to request that a radical re structure and re draft of the plan is made to ban building on greenbelt areas to protect Dacorum for future generations.
Included files	
Title	Question: Evidence Base
ID	EGS9213
Person ID	1267203
Full Name	Ms Eileen Martin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	Question 7: Do you agree that the Evidence Base that accompanies the Plan is adequate, up- to-date and relevant? Unable to comment
Included files	
Title	Question: Evidence Base
ID	EGS9267
Person ID	1267329
Full Name	MARTIN DAVIES
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS9276
Person ID	1267330
Full Name	Kat Worth
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS9320
Person ID	1267341
Full Name	ANDY WESTWOOD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>I object to the housing plan on the grounds that it is disproportionate in the totals for each of the areas - Hemel Hempstead, Berkhamsted and Tring - and that the formula that has created these high target numbers is fundamentally flawed (see here: https://www.building.co.uk/news/jenrick-abandons-mutant-housing-algorithm-to-focus-on-urban-development/5109569.article).</p> <p>Dacorum, in conjunction with MHCLG, should revise the numbers and the plan and they should be significantly lower. Furthermore, in any revision there should be much more detail provided on infrastructure assessments and improvements (eg traffic, clean air and capacity of schools, GPs and social care etc) and how they will be provided, including through Section 106 agreements.</p>

The existing green belt and recreational locations, including all school playing fields should be protected and any development must prioritise brownfield locations or sites within existing built on areas. Where development is permitted in any future plan over this timescale, it should be clearly set out which sites are priorities in next 5-10 years and which will only be developed in the longer term (ie after this time).

There should be full economic assessments of where people will work, including impacts on travel and public transport as well as a comprehensive local economic development plan for Dacorum as a whole. This should include appropriate liaison and joining up with other local authorities and a clear understanding of where housing and local development strategies are complementary. This should include neighbouring boroughs and also major employment/economic centres nearby such as London and Milton Keynes. This is particularly important given the proximity of Dacorum to these locations (and its distance/isolation from other parts of Hertfordshire including the main centres within Herts CC).

Lastly, any developments that are permitted to take place within such a revised plan, should prioritise affordable housing and homes with the highest environmental standards. Plans should demonstrate how they will contribute to national and local 'net zero' targets not just through building standards, but also through energy usage and reduced car use including for commuting, access to schools, local recreational facilities etc).

Included files

Title Question: Evidence Base

ID EGS9323

Person ID 1267332

Full Name Nandi Jordan

Organisation Details Chair
Berkhamsted and Tring Labour Party

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment	The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published: <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan • Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers
Included files	
Title	Question: Evidence Base
ID	EGS9354
Person ID	1267365
Full Name	Mr Jont Cole
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	

Title	Question: Evidence Base
ID	EGS9369
Person ID	1267367
Full Name	Sarah Johnson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation.</p> <p>This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored this has recommended that the Chilterns AONB becomes a national park, we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS9383
Person ID	1267368
Full Name	Peter Leighton-Murray
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS9397
Person ID	1267370
Full Name	Patricia Beloe
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail

and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.

— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.

— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.

— There is no agriculture strategy

Included files

Title Question: Evidence Base

ID EGS9446

Person ID 1267398

Full Name Alexandra and James Donaldson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

QUESTION: Evidence Base comment

—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.

— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.

— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.
 — There is no agriculture strategy

Included files

Title Question: Evidence Base

ID EGS9455

Person ID 1267401

Full Name JACKIE BELLAMY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment

- —Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.
- There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.
- The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.
- There is no agriculture strategy

Included files

Title Question: Evidence Base

ID EGS9486

Person ID 1267417

Full Name	Wendy and Paul Goodridge
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS9489
Person ID	1157289
Full Name	Rodney O'Callaghan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	No

* No	
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS9500
Person ID	1267419
Full Name	Eric White
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION: Evidence Base comment	<p>Its Sustainability Transport Connectivity plan is scarcely worthy of the name. Hemel Hempstead has no sustainable transport system as DBC suggests. No provision for cross-town fast travel connection to the train station unavoidably means more private car use. Developments should seek to achieve a 60% share of sustainable transport modes by 2050. This indicates that there are no plans to integrate sustainable transport provision in the actual development plans. Until 2050 there will be unregulated traffic? There are no Hemel Hempstead-wide public transport and cycling lane provision in any of the plans. Just vague promises, unevidenced, slipshod claims and ultimately incoherent aspirations.</p> <p>With additional housing planned in East Hemel Hempstead under the jurisdiction of St Albans, traffic will hugely increase. There are no provisions in the St Albans Local Plan for public transport links and no discussions how these developments</p>

will impact Hemel Hempstead. This blinkered, non-contiguous planning will result in higher private vehicle use and represents a dereliction of duty to the town's infrastructure, which will come under increasing strain due to this unsustainable growth.

Included files

Title Question: Evidence Base

ID EGS9651

Person ID 400471

Full Name Mrs Ruth Constable

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

I think the evidence base should be wider and more detailed: for example there is not sufficient evidence about using sites and buildings already within Tring for development or reconfiguration.

The Green Belt assessment is not up-to-date. The very specific contribution made by sites TR02 and TR03 to the Chilterns AONB immediately behind them, has not been taken into account.

The sites have not been assessed against the latest 2019 NPPFramework.

I think the whole environmental impact of using TR2 and TR3 should be much more closely analysed: for example, how any development would impact on views from Ashridge and Ivinghoe Beacon. The area is a very popular walking/recreational area for local residents and also tourists. The fact that it is designated an area of National Beauty must not be ignored.

Further, the evidence is not up-to-date because it is not clear how many houses are actually needed in Tring.

Included files

Title Question: Evidence Base

ID EGS9684

Person ID 1267468

Full Name Chris Berry

Organisation Details	CPRE Hertfordshire
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>For the reasons stated in answer to the earlier questions in this questionnaire, the Council should review and update the studies that it seeks to rely on for the preparation of the next, formal stage of the Plan, its publication as a pre-submission plan that all parties will be able to formally support or object to. This is because many of the documents relied on by the Council for this Regulation 18 consultation are out of date in respect of fundamentally important considerations that should inform the Council's proposals for future development in the Borough.</p> <p>In particular, the Council should reconsider, and use the latest reliable information on:</p> <ol style="list-style-type: none"> 1 Population trends, including ONS projections; 2 Household formation trends, including ONS projections; 3 Shifts in demand and need for land and floorspace for retail, business and employment as a result of the Covid pandemic and Brexit, with a particular focus on retail and office based uses; 4 Potential for urban regeneration; 5 Potential for increased density of development in accordance with national planning policy and regulations; 6 Potential for more housing from changes of use and conversion of buildings in accordance with the latest government changes to regulations; 7 Measures necessary to include in the Plan in order to ensure that national and local policies and targets on Climate Change will be met; 8 Infrastructure requirements, especially for water supply and waste-water and sewage treat throughout the Borough. <p>The Strategy fails to recognise the Climate Emergency declared by the Council, including the consequences of removing 850 hectares of Green Belt, greenfield and urban open space for housing.</p>
Included files	
Title	Question: Evidence Base
ID	EGS9795
Person ID	1267544
Full Name	CATHERINE HAY
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<ul style="list-style-type: none"> —Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely. There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape. The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB. There is no agriculture strategy
Included files	
Title	Question: Evidence Base
ID	EGS9809
Person ID	1263842
Full Name	Karen Roberts
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Insufficient infrastructure to sustain high growth numbers

The draft Infrastructure Development Plan (IDP) is woefully underdeveloped, which is very concerning given the 25% increased growth.

The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place an unacceptable burden on all types of infrastructure services and facilities in Dacorum. The plan as proposed does little to address the improvements in infrastructure required to support the proposed increase in housing. In particular, there are concerns regarding the impact on water supply and waste-water disposal. The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020's under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer, despite it already assessed as being "over-abstracted".

-

Major gap in transport plan between A41 and B440 (Leighton Buzzard Road)

The Transport Plan contained in the DLP is incomplete, and I have serious concerns about an increase in traffic through Potten End. Tring is projected to grow by 55%, and Berkhamsted by 25%. There is also a major development to the north of Hemel, called the "Hemel Garden Communities", which will comprise 1,550 homes built over the next 17 years, and a further 4,000 afterwards. Also envisioned is a potential new link road from J8 on the M1 through the new garden community to the B440 (Leighton Buzzard Road). A reference is also made to this new link road being utilised by Tring and Berkhamsted residents to access the M1. However, there is no consideration at all given to how those residents get to the B440 in the first place. The obvious answer is via Potten End. This will lead to a considerable increase in traffic through the lanes of the village, not only because of the substantial growth of the adjoining settlements, but also because the changes in the Hemel Hempstead road layout will make it harder to access the A414/M1 through Hemel (reduction of lanes on the A414). This will funnel even more traffic onto cross-country lanes. This is particularly the case for HGV vehicles which are prohibited from coming from the north via Water End Lane and from the south through Warners End (via Galley Hill) – in both cases because of weight restrictions on the relevant roads. Potten End has seen a noticeable increase in this type of traffic over the past few years since those restrictions have come into force.

Included files	
Title	Question: Evidence Base
ID	EGS9830
Person ID	
Full Name	
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS9858
Person ID	1267744
Full Name	GARETH BELLAMY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<ul style="list-style-type: none"> —Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.

- There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.
- The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.

There is no agriculture strategy

Included files

Title Question: Evidence Base

ID EGS9889

Person ID 1267759

Full Name PETER AND TRACY DUDLEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION: Evidence Base comment

We are writing to object to the plan for development in Dacorum for the following reasons:

The number of houses proposed for development per year until 2038 is based on figures produced in 2014, we understand that this proposes a figure of 1,023 houses being built in the area. These figures are now outdated and we're superceded by ONS figures produced in 2018 which only proposed 355 houses per year built. The government figures given need to be challenged by yourselves on this basis. In addition, the figures derived are not the objectively assessed for our area.

Secondly, green belt has been defined as land that can only be developed upon in exceptional circumstances. Despite the statement in the plan, the simple need for extra housing cannot be defined as exceptional.

Thirdly, resources cannot support the extra houses currently and there is nothing in the plan that states how this will be resolved. In particular, water extraction is at the maximum it can support without the extra supply that will be needed for these developments.

Fourthly, there has been insufficient effort to locate brownfield sites in preference to releasing greenfield sites for development.

Fifthly, the proportion of social housing proposed is far too low in comparison with the waiting list of 7,000 awaiting housing. It should be ensured that housing meets the needs of the people looking to be housed locally.

We are also concerned that there has been insufficient publicity of the plan to ensure that people know what is happening. It is apparent that a significant number of people did not receive a copy of the plan in the post. We did not receive one and had to request it very late on in the available time for consultation because we were unaware of it.

Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law". The same should be done for Dacorum.

Included files

Title Question: Evidence Base

ID EGS9962

Person ID 1267789

Full Name RICHARD WILNE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

I write to object to the proposed Dacorum local plan.

The number of houses proposed for Dacorum will alter the character of the area from rural with defined villages and market towns to a suburban sprawl. No explanation has been put forward justifying this detrimental change.

I am in particular shocked at the proposed massive expansion of Tring. We are all accustomed to new building and resigned to new housing estates built in the new placeless vernacular of the large developers, but the scale of the proposed changes is unacceptable.

The great achievement of post war planning is to prevent urban sprawl, using the Green Belt to keep towns distinct and separate. The proposed developments between Berkhamsted and Hemel Hempstead suggest that councillors and officials have failed to comprehend the legacy handed down to them and have no intention of living up to it.

I understand the grounds by which Green Belt land may be released for development and do not consider these to have been met. I do not have confidence in the council's forecasts of housing need or the analysis on which these are based; nor do I have confidence that these are robust as a forward-looking exercise given the as yet unknown effects of the pandemic on patterns of work and family formation, on the apparent migration from London and the resulting changes to the capital, on the future requirements for currently commercial premises in our towns, and on the effects of population size in the wake of Covid and Brexit, with the Economic Statistics Centre of Excellence having recently estimated that 1.3 million foreign-born residents have left the UK.

Given this uncertainty, it seems shortsighted to 'lock in' the destruction through irreversible change of a much cherished area by reliance on estimates that simply cannot bear the weight being placed on them.

I am acutely conscious of the environmental impacts inherent in the proposed plans. In particular, the effect on the chalk streams within the area will be profound. The dry upper reaches of the river Ver upstream from St Albans should be a minatory lesson for all involved in this decision and I urge all officials and councillors involved to walk this route and subsequently justify to themselves and residents why this should be inflicted on the rivers Gade and Bulbourne.

Included files

Title Question: Evidence Base

ID EGS9999

Person ID 1267854

Full Name MARTINA HALLEGGER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Evidence Base comment	<p>Its Sustainability Transport Connectivity plan is scarcely worthy of the name. Hemel Hempstead has no sustainable transport system as DBC suggests. No provision for cross-town fast travel connection to the train station unavoidably means more private car use. Developments should seek to achieve a 60% share of sustainable transport modes by 2050. This indicates that there are no plans to integrate sustainable transport provision in the actual development plans. Until 2050 there will be unregulated traffic? There are no Hemel Hempstead-wide public transport and cycling lane provision in any of the plans. Just vague promises, unevidenced, slipshod claims and ultimately incoherent aspirations.</p> <p>With additional housing planned in East Hemel Hempstead under the jurisdiction of St Albans, traffic will hugely increase. There are no provisions in the St Albans Local Plan for public transport links and no discussions how these developments will impact Hemel Hempstead. This blinkered, non-contiguous planning will result in higher private vehicle use and represents a dereliction of duty to the town's infrastructure, which will come under increasing strain due to this unsustainable growth.</p>
Included files	
Title	Question: Evidence Base
ID	EGS10024
Person ID	1267862
Full Name	ALEX CHAPLIN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p>

— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.
 — There is no agriculture strategy

Included files

Title Question: Evidence Base

ID EGS10090

Person ID 1268034

Full Name MR IAN GUNTER-JONES

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law

However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID	EGS10108
Person ID	1268045
Full Name	C PERRY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS10125
Person ID	1146091
Full Name	Mr John Foster
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as 'protect', 'growth' and 'renewal' areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.
Included files	
Title	Question: Evidence Base
ID	EGS10163
Person ID	1268071
Full Name	LINDA SLIM
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as 'protect', 'growth' and 'renewal' areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p>

— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — this development would encroach on this.

— There is no agriculture strategy

Included files

Title Question: Evidence Base

ID EGS10314

Person ID 1268339

Full Name Mr Adam Craig

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Evidence Base comment

Do you agree that the evidence base that accompanies the plan is adequate, up to date and relevant?

Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.

There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.

The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.

Included files	
Title	Question: Evidence Base
ID	EGS10323
Person ID	1268350
Full Name	Mrs Tamsyn Craig
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>Do you agree that the evidence base that accompanies the plan is adequate, up to date and relevant?</p> <p>Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p>
Included files	
Title	Question: Evidence Base
ID	EGS10346
Person ID	1268418

Full Name	JOSEPHINE O'NEILL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I do not believe that the Evidence Base is up to date or accurate.</p> <p>The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.</p> <p>The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.</p> <p>The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.</p> <p>Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date 2018 data.</p>
Included files	
Title	Question: Evidence Base
ID	EGS10363
Person ID	1268427
Full Name	GRAHAM HAYNES
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I endorse the comments by Tring in Transition (TinT) in their submission regarding the inadequacy of the evidence base (out of date / failure to explicitly address significant issues).
Included files	
Title	Question: Evidence Base
ID	EGS10441
Person ID	1268446
Full Name	JOHN KING
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS10477
Person ID	1268450
Full Name	JOSEPH STOPPS
Organisation Details	DACORUM GREEN PARTY
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>We agree with other local groups that the consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:</p> <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan • Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers <p>We believe a much simpler public consultation should be implemented. The current consultation is not fit for purpose. Asking members of the public to comment on a huge document and answer specific questions about the NPPF is not fit for purpose. We have been approached by numerous members of the public who have not responded to the consultation due to its complexity.</p> <p>At the time of submission the Central Government development figures for Dacorum are being reviewed and the consultation should be extended until these are published.</p>
Included files	
Title	Question: Evidence Base
ID	EGS10502
Person ID	869129
Full Name	Ms Ann Hetherington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS10553
Person ID	1268687
Full Name	Ms Isabelle Robinson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS10562
Person ID	1268702
Full Name	Kirstin Chaplin

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>7/ Do you agree that the evidence base that accompanies the plan is adequate, up to date and relevant?</p> <p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS10575
Person ID	1164729
Full Name	David Clarke
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS10593
Person ID	1268725
Full Name	CHARLOTTE SMITH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS10605
Person ID	1268726
Full Name	DR ADRIENNE GARNER

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I can't think of the evidence base as up-to-date given that it does not take into account the impact of the pandemic
Included files	
Title	Question: Evidence Base
ID	EGS10632
Person ID	1268732
Full Name	KATRINA BECKWITH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>I consider that the council's Green Belt assessment is not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances</p> <p>in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p>

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review in placed on demonstrating exceptional circumstances have been met by reference to case law.

However, in each case referenced, the housing need calculation is established and not in doubt.

Paragraph 137 of the Framework cannot be met with this review, as

it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS10666

Person ID 1268741

Full Name BRIAN WHITEHEAD

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

Included files

Title Question: Evidence Base

ID EGS10708

Person ID 1268746

Full Name DANIEL GARROD

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS10748
Person ID	1145586
Full Name	Miss Hannah Moynehan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published: <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan • Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers
Included files	
Title	Question: Evidence Base
ID	EGS10756
Person ID	1268754
Full Name	Mrs Rebecca Lumsdon

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The numbers are questionable. The government initially based the numbers on a formula now known as 'The mutant algorithm'. In December the government announced it would ditch this algorithm — many reasonably thought that the proposed numbers in the local plan would therefore fall. BUT THE GOVERNMENT CHANGED THE STATISTICS TO JUSTIFY THE NUMBERS ANYWAY — THE NUMBERS OF PROPOSED HOUSES HAVE THEREFORE INCREASED...
Included files	
Title	Question: Evidence Base
ID	EGS10762
Person ID	1268755
Full Name	Mrs Lesley Reynolds
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	-
Included files	
Title	Question: Evidence Base
ID	EGS10772
Person ID	1268759

Full Name	Mrs Catherine Rudin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The council's Green Belt assessment is not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework and the internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>The council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p> <p>The fundamental aim of the Green Belt policy is to contain urban sprawl by keeping land permanently open; essential characteristics of Green Belts are their openness and permanance. The council's plan would shatter the Green Belt in this area of Tring destroying the openness and permanence of the beautiful countryside. Once destroyed it cannot be restored. There are alternatives that should be considered.</p>
Included files	
Title	Question: Evidence Base
ID	EGS10777
Person ID	1268761
Full Name	Mr David Colvin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	-
Included files	
Title	Question: Evidence Base
ID	EGS10785
Person ID	1268762
Full Name	Mrs Natalie Hill
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS10795

Person ID	1268763
Full Name	Mr Michael Hill
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS10803
Person ID	1268767
Full Name	Erica Spanswick
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	

* No	
QUESTION: Evidence Base comment	<p>Major gap in transport plan between A41 and B440(Leighton Buzzard Road)</p> <p>The Transport Plan contained in the DLP is incomplete, and I have serious concerns about an increase in traffic through Potten End. Tring is projected to grow by 55%, and Berkhamsted by 25%. There is also a major development to the north of Hemel, called the “Hemel Garden Communities”, which will comprise 1,550 homes built over the next 17 years, and a further 4,000 afterwards. Also envisioned is a potential new link road from J8 on the M1 through the new garden community to the B440 (Leighton Buzzard Road). A reference is also made to this new link road being utilised by Tring and Berkhamsted residents to access the M1. However, there is <u>no consideration at all</u> given to how those residents get to the B440 in the first place. The obvious answer is via Potten End. This will lead to a considerable increase in traffic through the lanes of the village, not only because of the substantial growth of the adjoining settlements, but also because the changes in the Hemel Hempstead road layout will make it harder to access the A414/M1 through Hemel(reduction of lanes on the A414). This will funnel even more traffic onto cross-country lanes. This is particularly the case for HGV vehicles which are prohibited from coming from the north via Water End Lane and from the south through WarnersEnd (via Galley Hill) – in both cases because of weight restrictions on the relevant roads. Potten End has seen a noticeable increase in this type of traffic over the past few years since those restrictions have come into force.</p>
Included files	
Title	Question: Evidence Base
ID	EGS10848
Person ID	1145633
Full Name	Mrs Suzanne Nixon
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION: Evidence Base comment	<p>The situation in the UK is constantly changing. The effect of Covid 19 on the UK economy has far reaching repercussions. Retail, hospitality and workplaces have all been hugely impacted. How we shop and work may have changed considerably</p>

in future. We may no longer need the volume of office and retail space deemed essential in the past. This could offer new opportunities for re-purposing buildings for residential use as well as releasing commercial land for housing. This could reduce the pressure to build on green field and Greenbelt land.

It does seem to me that the scale of development proposed cannot be compatible with current thinking on climate change and reduction of carbon emissions. It just doesn't add up: the impact on quality of life and wildlife habitats, increased traffic causing air pollution and high carbon emissions, the carbon released by construction on this scale, the lack of infrastructure to support such development, the loss of green spaces which provide vital breathing space, helping to mitigate carbon emissions.

Included files

Title Question: Evidence Base

ID EGS10888

Person ID 1268804

Full Name Mr Mark Dixon

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Evidence Base comment

General Comment

The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.

The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.

The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.

Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date 2018 data.

Included files

Title Question: Evidence Base

ID EGS10894

Person ID 1268687

Full Name Ms Isabelle Robinson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

Included files

Title Question: Evidence Base

ID EGS10904

Person ID 1268814

Full Name Ms Emma Cotton

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment	<p>I do not believe that the Evidence Base is up to date or accurate.</p> <p>The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.</p> <p>The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.</p> <p>The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.</p> <p>Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date 2018 data.</p>
Included files	
Title	Question: Evidence Base
ID	EGS10947
Person ID	1268880
Full Name	Ms Jo-anne Tunmer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p>

— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.

— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.

Included files

Title Question: Evidence Base

ID EGS10978

Person ID 1268903

Full Name ANGELA NODDER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment Apparently the scale of the development is based on an outdated assessment of need from a ONS survey of 2014. However an ONS survey of 2018 suggests the need is for about half the number of dwellings.

This factor alone means the whole scheme needs to be re-evaluated.

Included files

Title Question: Evidence Base

ID EGS10990

Person ID 1162376

Full Name Jade Holmes

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11003
Person ID	1263256
Full Name	Anthony Blumsom
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	(no comment)

Included files	
Title	Question: Evidence Base
ID	EGS11013
Person ID	333882
Full Name	Mr Mark Barfield
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11026
Person ID	1268910
Full Name	SIMON LAWSON
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>I write to reply to the consultation on the Dacorum Local Plan, 2020-2038. I wish to object to the development as currently proposed.</p> <p>Outdated assumptions</p> <p>In my business experience, a plan is only as good as the assumptions in which it is based. By using housing projections from 2014, rather than more recent ONS data from 2018, the amount of housing required in our area may be significantly overstated. I understand that Central Government has instructed you to use the 2014 projections, but I wonder if there is scope to resist this, on the basis that it may lead to over-development, including unnecessary erosion of Greenbelt land. We are also about to embark on a Census - might this not present an opportunity to await its publication and base your projections on the most up-to-date information available?</p> <p>I accept that the Dacorum area should take its fair share of new housing. However, I am concerned that the current plan is based on outdated assumptions.</p> <p>I invite the Council to revisit its projections based on more current information.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11035
Person ID	1268909
Full Name	Dr Leslie Kennedy
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	There is not enough evidence of local knowkedge or enough consideration of the impact on adjacent districts/counties
Included files	
Title	Question: Evidence Base
ID	EGS11046
Person ID	1145445
Full Name	Mr Jason McInerney
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base

ID	EGS11058
Person ID	1268912
Full Name	SIAN FITZPATRICK
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS11065
Person ID	1268913
Full Name	SONIA FAIRBARN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Please see Tring in Transition (TinT) comments relating to the inadequate evidence base (out of date / failure to explicitly address significant issues). I am in agreement with the TinT comments.
Included files	
Title	Question: Evidence Base
ID	EGS11070

Person ID	1268914
Full Name	EDITH HARKINS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I think the government has to reevaluate the figures of the proposed numbers.
Included files	
Title	Question: Evidence Base
ID	EGS11076
Person ID	1144903
Full Name	Mr Brian Rook
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS11096
Person ID	1258923

Full Name	Arthur Barfield
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11114
Person ID	1268939
Full Name	Ms Sylvia O'Brien
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11138
Person ID	1268956
Full Name	Mr John Bell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>The current Local Plan relies on outdated data, from a study in 2011 – which showed potential problems with water supply / drainage. The revised Local Plan must make it clear what impact the development proposals will have on this, as well as sewage – especially if after review there is still a greater number of housing suggested.</p> <p>The level of new housing currently proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions. In these circumstances there would be no option but to extract additional water from</p>

the chalk aquifer which in turn would cause further damage to the Borough's precious chalk streams. New supplies of water are not likely to be possible until after 2030.

The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.

Included files

Title Question: Evidence Base

ID EGS11186

Person ID 1264551

Full Name Mark Somervail

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTION: Evidence Base comment The plan is based on the wrong housing targets. It is based on housing targets derived from the out of date housing projections (922) from 2014. The plan should be based on the newer 2018 projections which are far lower (430).

Included files

Title Question: Evidence Base

ID EGS11201

Person ID 1268982

Full Name Mr Andrew Yeomans

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I support the submissions of the Chiltern Countryside Group (CCG) and the Grove Fields Residents Association (GFRA) on this question.</p> <p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11229
Person ID	
Full Name	
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and</p>

contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS11251

Person ID 1262469

Full Name Mark Waters

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

QUESTION: Evidence Base comment

I understand it is important to re-analyse the statistics behind the Local Plan in terms of the impact on housing targets and algorithms on individual council areas as compared to similar areas nationwide, in the south of England and bordering London.

Also to consider the methodology behind Dacorum's targets and on the choice of 2014 ONS housing estimates as the baseline rather than the more recent 2018 estimates.

Included files

Title Question: Evidence Base

ID EGS11252

Person ID	1268990
Full Name	Mr Nick de la Bedoyere
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the councils Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11267
Person ID	1268893
Full Name	Mr Martin Hopping
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	No

* No	
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11277
Person ID	221884
Full Name	Ms Eliza Hermann
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>The Evidence base is not up-to-date and relevant. The Council should:</p> <ul style="list-style-type: none"> • use the latest 2018 ONS projections including population trend data and household formation data in calculating housing need;

- analyse and take into account shifts in demand and need for land and floorspace for retail, office and employment as a result of the pandemic, recognising that a significant shift towards remote working and working-from-home is likely to be sustained and cause a reduction in demand for retail, office and employment uses; and
- take into account the latest evidence on housing need being met through 'windfall' delivery, with the average over the past three years (322 dwellings per annum) serving as a baseline and then factoring in a likely increase from the impact of both the pandemic and recently expanded permitted development rights to convert office and retail space to residential use.

Included files

Title Question: Evidence Base

ID EGS11293

Person ID 1268994

Full Name Mrs Julie Hopping

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
 * Yes
 * No

No

QUESTION: Evidence Base comment

I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files	
Title	Question: Evidence Base
ID	EGS11300
Person ID	1268998
Full Name	Mr Philip Hodgson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	No understanding has been shown of the effect on quality of life of Tring residents present and future.
Included files	
Title	Question: Evidence Base
ID	EGS11324
Person ID	1269000
Full Name	Mrs Tracey Franklin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I do not agree that the Evidence base is up-to-date, as is proven numerous times by local Councillors. The ONS (Office for National Statistics) has provided household projections most recently in 2018. This plan is based on older out of date ONS projections from 2014. Being 7 years old!

As this impacts the town and its residents in so many negative ways, it should be mandatory that the projections are based on the most up to date information.

Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS date would likely reduce to less than 500 per annum using the most 2018 projections. A more than 50% reduction!

Included files

Title Question: Evidence Base

ID EGS11335

Person ID 1269004

Full Name Mr Kevin Coleman

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

- AECOM Site Assessment Study – A key flaw in the AECOM site assessment work is, as we have noted above, its wholly illogical conclusions and lack of rigour in respect of two key issues, namely Green Belt and heritage, as follows:
- Green Belt – the conclusion that the site “performs very poorly in Green Belt terms” is simply not borne out either by the preceding analysis in the report, or by any objective analysis when the level of containment and relative position in respect of adjoining development are taken in to account. Moreover, this conclusion is wholly at odds with the analysis in the Sustainability The SA correctly identifies

that Duckhall Farm has a “sense of enclosure” and separation from the wider landscape (i.e. in Green Belt terms it is more contained), and also correctly states in respect of Grange Farm that “development at this prominent location would extend Bovingdon into the countryside”, the AECOM report somehow contrives to come to the opposite conclusion and

suggest that the Duckhall Farm site has the greater impact. This is nonsensical, and the two assessments are clearly at odds with each other;

- Heritage – the AECOM study shows in Volume 2 that with a set-back to the adjoining Listed Buildings, heritage issues can be addressed, and yet still scores the Duckhall Farm negatively in this respect despite having identified and taken in to account the relevant mitigation. The negative conclusion in respect of heritage impact is therefore not internally consistent with the design work in Volume
- Accessibility – the AECOM report rightly notes that the Duckhall Farm site has “good” access to local facilities whereas the Grange Farm site has “reasonable” However, as per our previous comments, not only is the assessment of

“reasonable” in respect of Grange Farm highly questionable given the lack of lit and convenient routes, the AECOM appraisal does not properly grasp the significance of the distinction that it makes in this regard – that one site is likely to promote safe walking and cycling in to the village centre and therefore not exacerbate congestion on the High Street, and the other is likely to generate frequent local car trips to the High Street because the options for walking and cycling are on;t, at best.

“reasonable”.

- DBC Site Selection Topic Paper – the DBC site assessment report contains many of the same flaws as the AECOM report, but also relies on erroneous conclusions regarding infrastructure Particular comments at this stage include:
- Green Belt – the DBC assessment of relative impact on Green Belt relies primarily on the findings of the wider Green Belt study and the way that assessment considered wider land parcels in terms of Green Belt purposes. As we have repeatedly pointed out, at the site selection stage, sites need to be assessed in terms of their actual individual impact on the Green Belt, not the impact of the wider parcel of land assessed for the purposes of the Green Belt study. It is the parcel of land that is proposed for removal from the Green Belt where the impact occurs, not the remainder of the strategic parcel, and therefore reliance on the wider strategic assessment is flawed. On a like for like basis, looking at land take and impact on the openness of the Green Belt around Bovingdon, there is no doubt that Grange Farm has the larger adverse impact (a conclusion that is supported by the findings of the SA, as discussed above);

- Heritage – as with the AECOM study, the DBC assessment identifies that mitigation can be provided to address the impact on heritage assets, indeed it goes further and accepts explicitly that heritage impacts can be sufficiently mitigated and indeed that in some respects the setting of heritage assets could be enhanced, but then (a) makes the erroneous comment that this may affect development quantum, which ignores the AECOM capacity study which shows this is not the case and (b) still refers to potential adverse heritage impact in the conclusion, which is not borne out by the analysis presented;
- Accessibility – the DBC study correctly identifies that the Duckhall Farm site “is in reasonable proximity to existing services and facilities on Bovington High Street”, but, as with the AECOM and SA work, fails to spot the inherent difficulties in providing safe and secure pedestrian routes between the High Street and Grange Farm, in addition to failing to address the relative distance that Grange Farm lies from the main village services;
- Undeliverable Infrastructure – Fundamentally, the selection of Grange Farm appears to have been based in large part upon an expectation of benefits arising from that scheme which cannot be secured, or which do not actually provide any wider benefit. In particular, we have noted that the attempt to secure a 3FE primary school site will fail because there is no need for such a site and it cannot be legally bound under the CIL Regulations. In respect of the alleged drainage benefits, the same issues apply – any ‘over extra’ benefit in terms of existing drainage conditions would be minimal as the performance requirement for any drainage scheme in this instance is nil net detriment i.e. no greater than greenfield run-off, and any attempt to impose a higher requirement to satisfy wider existing issues will not be legally

enforceable. Finally the proposed ‘park’ in this location would have limited wider benefit to the village as the site is so peripheral to the majority of existing residents.

As the above shows, the Council is essentially relying on three different pieces of work in respect of site selection – the SA, the AECOM analysis, and its own analysis. The three different pieces of work provide inconsistent pieces of analysis in key respects, but all of them suffer deficiencies. In some cases the deficiencies are common to all (for example the lack of appreciation as to what the difficulties of providing safe and convenient pedestrian access to Grange Farm means in practice). In some cases the deficiencies are internal to the individual studies (conclusions not reflecting the preceding analysis). In some cases the deficiencies relate to the lack of consistent findings (the manner in which Green Belt impacts are considered, for example). The combination however is a flawed and inconsistent evidence base that does not support the chosen approach to site selection.

Included files

Title

Question: Evidence Base

ID	EGS11357
Person ID	221830
Full Name	Mrs Baerbel de la Bedoyere
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11365
Person ID	398597
Full Name	Mrs Caroline Freer
Organisation Details	Flamstead Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	As you have based your assumptions on the out-dated Department for Communities and Local Government data, rather than the 2018 ONS projections. Your out-dated data results in an over-development and will create a supply:demand imbalance, with all the issues that will then arise.
Included files	
Title	Question: Evidence Base
ID	EGS11393
Person ID	1207629
Full Name	Strategic Planning Department
Organisation Details	Strategic Planning Department Three Rivers District Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	No specific comments
Included files	
Title	Question: Evidence Base
ID	EGS11397
Person ID	1269021
Full Name	RUPERT SELDON
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	The Evidence Base appears to be using the ONS target from 2014, ignoring the reduced target from the 2018 ONS. The Evidence Base doesn't appear to take into account any change of need as a result of the pandemic.
Included files	
Title	Question: Evidence Base
ID	EGS11403
Person ID	1262227
Full Name	James White
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>The algorithm method for calculating housing need which has been used by the Council is not the correct means to calculate the housing needs of the Borough. The correct calculation of the housing needs in Dacorum should be based on the most recent and relevant data, which is currently the 2018 based Office for National Statistics (ONS) projections. The Council has wrongly based its calculations on the outdated 2014 based ONS data which will result in a significant overestimate of housing needs and brings into question the soundness of any local plan which is based on them. I would remind the Council that on Wednesday 16 December the government published its response to the local housing need proposals on the consultation on changes to the current planning system. This sets out important changes to the standard method which has been amended so that the 20 most populated cities and urban centres in England (none of which are in Dacorum) see their need uplifted by 35%.</p> <p>The Government also said:</p> <p>"Within the current planning system the standard method does not present a "target" in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision</p>

on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt."

Included files

Title Question: Evidence Base

ID EGS11409

Person ID 1269022

Full Name JENNI WHITE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

The algorithm method for calculating housing need which has been used by the Council is not the correct means to calculate the housing needs of the Borough. The correct calculation of the housing needs in Dacorum should be based on the most recent and relevant data, which is currently the 2018 based Office for National Statistics (ONS) projections. The Council has wrongly based its calculations on the outdated 2014 based ONS data which will result in a significant overestimate of housing needs and brings into question the soundness of any local plan which is based on them. I would remind the Council that on Wednesday 16 December the government published its response to the local housing need proposals on the consultation on changes to the current planning system. This sets out important changes to the standard method which has been amended so that the 20 most populated cities and urban centres in England (none of which are in Dacorum) see their need uplifted by 35%.

The Government also said:

"Within the current planning system the standard method does not present a "target" in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt."

Included files

Title Question: Evidence Base

ID	EGS11415
Person ID	1269023
Full Name	DOUG DUNN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS11454
Person ID	1264362
Full Name	Juliet Miller
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:</p> <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan

- Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers

Included files

Title Question: Evidence Base

ID EGS11463

Person ID 1261429

Full Name Douglas Fisher

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment This comment refers to the Urban Capacity Study

 This part of the evidence base is not adequate nor up-to-date as it does not include any suitable and available sites for an additional 1800 homes.

Included files

Title Question: Evidence Base

ID EGS11470

Person ID 1262872

Full Name Fiona Trinder

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes	
* No	
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS11478
Person ID	
Full Name	
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Water DBC is relying on outdated data, from a study in 2011 – which showed potential problems with water supply / drainage. It's not clear what impact the development proposals will have on this, as well as sewage – especially with a greater number of housing suggested.
Included files	
Title	Question: Evidence Base
ID	EGS11489
Person ID	
Full Name	
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Evidence Base : The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published: Climate Change and Sustainability SPD, Detailed Design Guide SPD, Climate Change Strategy and Action Plan, Final version of Strategic Design Guide SPD as this specifies details and the criteria for the Sustainability Statements to guide developers
Included files	
Title	Question: Evidence Base
ID	EGS11503
Person ID	865014
Full Name	Mr Robert Turnbull
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the councils Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The councils assessment of Green Belt land within the Borough identifies</p> <p>substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>

Included files	
Title	Question: Evidence Base
ID	EGS11508
Person ID	1269116
Full Name	Mr & Mrs S & J Ballantyne
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	I'm not able to assess that technical point
Included files	
Title	Question: Evidence Base
ID	EGS11518
Person ID	1269117
Full Name	ANITA PARRY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and

contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS11524

Person ID 1269119

Full Name JENNIFER BLOGG

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Evidence Base comment

The Emerging Strategy for Growth appears to be based on selective strategy documents* that have no formal planning status and which have not been widely consulted on. As a result, the Strategy has failed to take account of a number of important issues - the climate emergency, the environmental impact of the proposed development and the prioritisation of 'brownfield' sites to meet housing needs. The pursuit of economic growth as promoted by the Hertfordshire Local Enterprise Partnership and implied by background work for a South West Herts Joint Strategic Plan, should be balanced against environmental concerns and climate obligations before they are tested through the local plan process.

*Dacorum Growth & Infrastructure Strategy to 2050, Dacorum Corporate Plan 2020-2025 and Corporate Action Plan

The Strategy fails to take into account the combined impacts of the coronavirus pandemic and recently expanded permitted development rights, both of which create many more opportunities for conversion of commercial space (especially office and retail) to residential use, and thus windfall provision of housing throughout the Borough is likely to be much higher than estimated. A more positive place making strategy is needed as part of a formal brownfield land review to realise local enhancement of the existing built environment with benefits for existing residents. This will ensure much greater emphasis should be given to regeneration of previously developed land in order to reduce the amount of housing and employment development on Green Belt and other greenfield sites outside of existing towns and villages.

Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan. Dacorum Borough Council declared a climate emergency more than a year ago. Despite this and some well-intentioned promises, the Strategy as published clearly prioritises economic growth and greenfield land development over considerations for the climate emergency. In so doing, it has failed to take account of legislation and recommendations from various UK bodies on how carbon reduction plans have to be integral to the development of local plans. Words of 'encouragement' are insufficient and no substitute for detailed carbon budgets and committed targets of local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF) and the 2004 Planning & Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050 and this work should underpin a revised land use and development strategy.

Included files

Title Question: Evidence Base

ID EGS11527

Person ID 1269119

Full Name JENNIFER BLOGG

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment

The numbers are questionable. The government initially based the numbers on a formula now known as 'The mutant algorithm'.

In December the government announced it would ditch this algorithm — many reasonably thought that the proposed numbers in the local plan would therefore fall. BUT THE GOVERNMENT CHANGED THE STATISTICS TO JUSTIFY THE NUMBERS ANYWAY — THE NUMBERS OF PROPOSED HOUSES HAVE THEREFORE INCREASED...shocking!

Included files

Title Question: Evidence Base

ID EGS11535

Person ID 1144732

Full Name MR john reynolds

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

Included files

Title Question: Evidence Base

ID EGS11555

Person ID 1269122

Full Name KATHRYN WHITTLE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No	
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and</p> <p>yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However , in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11566
Person ID	1269123
Full Name	KENTON WHITTLE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and</p> <p>yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the</p>

individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 **NPPF**, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS11589

Person ID 1269146

Full Name MAXWELL CLIFTON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

Included files

Title Question: Evidence Base

ID EGS11635

Person ID 1158198

Full Name JACK ARMSTRONG

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	(no comment)
Included files	
Title	Question: Evidence Base
ID	EGS11643
Person ID	1269148
Full Name	SIMON AND ANNA BARNARD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>The Plan fails to take into account the following:</p> <ul style="list-style-type: none"> - the government is revisiting the required housing figures - the pandemic which has changed how everyone now lives and works has been identified by the Council in their consultation, <i>'Learning from Lockdown'</i> - the Glover Review on National Parks and AONBs - Mayor of London's London Plan relating to the Green Belt in the Home Counties - Ministry of Housing, Communities & Local Government - A National Design Guide for Planning and a system of Design Coding for Local Plans
Included files	
Title	Question: Evidence Base

ID	EGS11654
Person ID	1269150
Full Name	Mrs Helena Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The evidence being used is out of date and inaccurate. The Office for National Statistics (ONS) has provided household projections most recently in 2018, however this plan is using out of date projections from 2014.</p> <p>I believe if the more recent projections were being used this would significantly reduce the amount of new houses needed. Our local councillor has indicated that projections would reduce from 1000+ houses per annum to approximately 500 per annum using the more up-to-date data.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11666
Person ID	1269152
Full Name	SIMON RHEAD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's

assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

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Included files

Title Question: Evidence Base

ID EGS11693

Person ID 1269212

Full Name PETER SCOTT

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION: Evidence Base comment

The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:

- Climate Change and Sustainability SPD,
- Detailed Design Guide SPD
- Climate Change Strategy and Action Plan
- Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers

Included files	
Title	Question: Evidence Base
ID	EGS11695
Person ID	1146103
Full Name	Mr Simon Toon
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>Section 10 (Delivering the Infrastructure to Support Growth) refers in detail to the Draft Dacorum Infrastructure Delivery Plan this IDP is also referenced in the Introduction and the Vision And Strategic Objectives, and many other places in the Local Plan however no link is provided to this IDP document. I had to go searching for this on google, and eventually found it here https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-draft-infrastructure-delivery-plan---november-2020.pdf?sfvrsn=a2cf0c9e_8</p> <p>Such an important reference document as this should be provided in this consultation process, as it contains important details about the relevant infrastructure provisions that support the plan.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11715
Person ID	1269217
Full Name	Mr David Hulse

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11731
Person ID	1152494
Full Name	MRS G RUSSELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	<p>The Council has used the outdated 2014 based DCLG data of household projection, resulting in an over-estimate of housing need, and therefore invalidates the proposed housing growth. Using the 2018 ONS population and household projections a more realistic estimate would be between 351 and 536 houses pa in the Plan period. And the Council has failed to consider recent trends in local population and number of households.</p> <p>It has also used the 2010 Water Scoping Study. This is also now outdated, especially given that climate change is accelerating.</p> <p>Also, using the Dacorum Growth & Infrastructure Strategy to 2050, Dacorum Corporate Plan 2020-2025 and Corporate Action Plan documents, which have not been consulted on and have no formal planning status has meant that the DBC Emerging Strategy for Growth fails to take sufficient account of the climate emergency, the environmental impacts and fails to prioritise brownfield sites. The Plan is focussed much more on economic growth rather than sustainability and protection of the environment, even where this is a legal requirement for DBC.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11746
Person ID	1269230
Full Name	CHARLES GABRIEL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit will no doubt continue to decrease this projection.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11757
Person ID	1269233

Full Name	CIARA KENT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11779
Person ID	871625
Full Name	Mrs Clare Francis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11783
Person ID	1269235
Full Name	Miss Eleanor Smith
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	(no comment)
Included files	
Title	Question: Evidence Base
ID	EGS11793
Person ID	1264468
Full Name	Melanie Parr
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS11800
Person ID	1269243
Full Name	HARRIET MESHER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS11805
Person ID	1269244
Full Name	GAVIN BAYLISS
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS11830
Person ID	350823
Full Name	Mrs Sue Yeomans
Organisation Details	Chairman Chilterns Countryside Group
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I fully support the response of the Chiltern Countryside Group to this question.
Included files	
Title	Question: Evidence Base
ID	EGS11835
Person ID	1262872
Full Name	Fiona Trinder
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS11869
Person ID	1269275
Full Name	KALLIOPI KOUTSOU
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.
Included files	
Title	Question: Evidence Base
ID	EGS11896
Person ID	1269277
Full Name	DEFINE PLANNING AND DESIGN LTD
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Comments in relation to the Council's Evidence Base and its implications for the Emerging Strategy for Growth document are outlined in the response to Questions 1 to 5 above.
Included files	
Title	Question: Evidence Base
ID	EGS11918
Person ID	1268937
Full Name	Mrs Lynette Hyde
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>Q 7</p> <p>Evidence Base up to date and relevant?</p> <p>NO</p> <p>The pandemic has changed everything.</p> <p>The assumptions on which the proposals are based are flawed and cannot be progressed upon. The Dacorum Borough Council and Office of National Statistics projections are well below.</p> <p>COVID CHANGES EVERYTHING!!</p>
Included files	
Title	Question: Evidence Base

ID	EGS11933
Person ID	1150963
Full Name	SUE TAYLOR
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p><u>Open Space designation, quality of research</u> Your Local Plan Emerging Growth strategy 2020-2038 Draft Proposals Map shows a large area of 'Open Space' between the Grand Union Canal and the Highstreet near Durrants Lane, this is a <u>Private House and Garden</u> , according to the Study you commissioned 'Dacorum Borough Council</p> <p>Open Space study assessment report July 2019 by Knight Kavanagh & Page Ltd' private gardens do not qualify as Open Space and was not identified by them as open space, after all it is not available to the public as allotment, as part of a school or for recreation, neither is it a green corridor. So why is it shown on your plan? Furthermore I do not think the heavily built up school sites should be included, playing fields should be but not the hardstanding or buildings.</p> <p>This implies your calculations are wrong and that Berkhamsted and Northchurch are even more impoverished for Urban Open Space than shown. Therefore additional protection needs to be given to the informal recreation routes we enjoy such as the upper part of Bell Lane and Shootersway which connect through to the wider countryside and its network of lanes and footpath including the Chilterns Cycle Route.</p> <p>A second anomaly/error is that Bell Lane is designated an 'important thoroughfare' that is road. When it is a very poorly maintained single track road with few passing places.</p> <p>The errors bring into question if the research on which the plan is based is robust, and if instead the plan should be declared unsound.</p>
Included files	
Title	Question: Evidence Base
ID	EGS11978
Person ID	1264526
Full Name	Peter King

Organisation Details	Water End & Upper Gade Valley Conservation Society
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>7.1 Adequacy The evidence is in places inadequate especially in relation to sustainability. It provides a biased one-sided support to the Plan</p> <p>7.2 Relevance The evidence presented is generally relevant. It should be.</p> <p>7.3 Up-to-date It is clear that not all the evidence and information is up to date and that those providing it have no first-hand experience of the issues facing the local communities, nor the geography or the road network. They have got the road number wrong</p>
Included files	
Title	Question: Evidence Base
ID	EGS11979
Person ID	1269352
Full Name	Walid Youssef
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	Housing Strategy is a crucial section. It gives more detail of where homes are to be located. BRAG serious concerns about the allocation and how the numbers have been calculated and a missed opportunity to avoid Green Belt development at Berkhamsted and Tring. The Housing Strategy is fuelled by faulty vision, settlement hierarchy, unjustified housing

target and exacerbated by flawed handling of windfall projections, thus failing to maximise growth in urban areas at the expense of Green Belt. Also fail to take into account post-pandemic working practices.

Included files

Title Question: Evidence Base

ID EGS12012

Person ID 1269353

Full Name TESSA BARFIELD

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

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Included files

Title Question: Evidence Base

ID EGS12033

Person ID 1207341

Full Name	Mr Adam Wood
Organisation Details	Growth and Infrastructure Manager Hertfordshire Local Enterprise Partnership (and Herts IQ)
Agent ID	1264277
Agent Full Name	Rob Shipway
Agent Organisation	Lead Consultant Civix
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>Herts LEP asks for the following to be considered in relation to the evidence base</p> <p>1 Additional Context – Expanded policy research</p> <p>1.1 We ask that the emerging Local Plan be appropriately informed by additional policy research which underpins a number of critical employment related issues. These are summarised in Appendix 1 but relate to the following:</p> <ul style="list-style-type: none"> - Herts LEP - The Herts Economic Recovery Plan (August 2020) - KPMG – The Future of Towns and Cities in the UK Post Covid-19 (January 2021) - Herts LEP - Hertfordshire Key Sites Report (March 2020) <p>2. Additional Context – Dacorum’s employment activities in a wider context</p> <p>2.1. We think it important to provide a wider context to Dacorum by covering some Hertfordshire wide indicators of key sector strengths which add significant value to the Hertfordshire economy. These are set out in Appendix 2.</p> <p>1 Herts IQ including Maylands – Herts IQ aspirations and initiatives to promote high quality investment in key sectors</p> <p>3.1 Appendix 3 sets out the aspirations of Herts IQ to create quality outputs and the measures that are being put in place to underpin these.</p> <p>1 Herts IQ aspirations for specific Maylands Business Park Development Sites</p> <p>4.1 In Appendix 4 we list the development sites critical to meeting Herts IQ objectives.</p> <p>1 Decarbonisation initiatives through use of renewable energy – a possible exemplar based at Maylands Business Park</p> <p>5.1 Herts IQ is currently progressing initiatives in relation to this; such details as can currently be provided are set out in Appendix 5.</p>

1 Sector demand studies at Herts IQ

6.1 Herts IQ is currently engaged in studies into likely investor demand for development sites in Herts IQ and the influence that could be brought to bear on this; such details as can currently be provided are set out in Appendix 6.

Appendix 1 – Key Additional Policy Context in relation to the emerging Dacorum Local Plan

A. Herts Economic Recovery Plan (Herts LEP August 2020)

A.1 We would welcome the ESG making reference to the Plan as part of the way in which it seeks a response to the pandemic. The LEP's Herts Recovery Plan (August 2020) provides a rapid and focused analysis of how the county can respond to the vulnerabilities that the COVID-19 pandemic has exposed, and the threats it has posed to our way of life – both socially and economically.

A.2 The Plan recognises that any response must acknowledge that Hertfordshire has both assets and opportunities that will provide the foundations for renewal and growth. It is structured around main three short/medium term Delivery Packages (fashioned to work in tandem with government sponsored interventions) coupled with two Transformational Programmes for longer term action, reflecting what is set out in the LEP's draft Industrial Strategy.

A.3 Both Herts IQ, Hemel Garden Communities and other employment and enterprise initiatives within Dacorum are expected to contribute to both wider and focused initiatives to promote economic recovery.

B. KPMG – The Future of Towns and Cities in the UK Post Covid-19 (January 2021)

B.1 A number of commentators are starting to visualise what the UK and indeed the wider world will look like when (or possibly if) the Covid-19 is eradicated or brought under control. Any studies at this time must be heavily caveated, as simply nobody can know when that can be and also cannot be certain what any recovery will 'recover to' – it is probably safe to assume there are numerous parallel scenarios that can be conjured up.

B.2 Additionally, we should perhaps recognise that Covid-19 is potentially being used as a 'piggy back' of changes in policy, funding support etc that landowners, businesses and developers were already pushing for to serve their own and their clients' interest.

B.3 The KMPG study starts with a broad assessment of the changes in business practices the pandemic has wrought, with a broad assessment of implications. It is not backed up by detailed evidence but provides a useful perspective from a major company that is experiencing first-hand the implications of the virus in real time along with other businesses. The study concludes the following:

- foregoing most business travel allows companies to save costs and gave workers more time to focus on their core tasks, potentially making them more productive
- The proliferation of virtual meetings also enabled broader access to specialist advice and analysis is now almost always available anywhere in the world at short notice (and at much less expense as travel costs and travelling time are avoided)

- Suspending the daily commute enables workers to save time and money, allowing many to work more flexibly
- However an obvious downside of this is a blurring between work and home life
- The deep recession triggered by the pandemic has squeezed profit margins across a swathe of businesses, with companies responding in part by reducing property commitments, sometimes significantly
- Some businesses, (including, KPMG notes, its own) have gone down the route of transforming their offices into collaboration hubs, where many workers will come to meet rather than sit at a desk and perform tasks individually.
- Surveys show that most workers would prefer to return to a hybrid mode of work combining days with clients and colleagues in the office and days at home

B.4 KPMG then considers the implications of this in relation to towns and cities. The report notes a corresponding collapse in retail activity in these locations but does not go into the post Covid-19 implications of this directly; instead, it focuses on what it thinks are the likely decline in town centre jobs, as it considers that many of the changes identified in B.3 above are irreversible (or only partially reversible).

B.5 Based on its analysis (which is not set out in the report) of 109 towns and cities, Hemel Hempstead is joint equal (with another new town, Bracknell) in standing to lose the most town centres jobs – 27.4% in all. Other South West Herts towns also suffer disproportionately, with Watford 4th and St Albans 19th in terms of highest losses.

B.6 When other impacts are factored in – the loss of retail jobs due to online shopping increases sustained post pandemic and what KPMG calls *'the strength of cultural offering'* (the presence of existing facilities such as sports facilities; culture and recreation assets (ranging from amusement parks to museums and performing arts venues); and hospitality venues (including restaurants, cafe, pubs and bars), Hemel Hempstead stands to be the second worst affected of all 108 towns and cities surveyed.

B.7 The KPMG take on this is that whilst food retail rents will remain high, non-food retail rents will fall substantially, opening up prime town centre space for conversion to higher education, community and residential uses.

B.8 In terms of impact of online shopping, the report suggests the following:

- Online sales have grown by 50%+ in nine months to January 2021, accelerating a trend that would have taken five years plus to deliver in normal circumstances.
- It is expected that 40-50% of all non-essential retailing will be transacted online going forward, up from around 30% pre-COVID. This is just a continuation of a trend that has seen over the last 10 years
- KPMG consider that 50-60% of transactions will be conducted in stores, which represents a reduction from the 65% penetration seen in non-food online during the first lockdown
- Alongside online, convenience stores have been key beneficiaries of the COVID pandemic and although standalone 'big box' locations have also benefitted, this may only be temporary and the decline in sales values in these locations witnessed pre-COVID are likely to resume
- The big structural change in online retailing is within the food: pre-COVID penetration was at 6.5%. It now stands at approximately 15%, with further growth to 20-25% possible, and these levels are here to stay

- As grocery represents 50% of the overall UK retail market and there are tens of thousands of grocery stores in the UK grocery stores in the UK this will lead to major implications, with locations needing to be downsized and/or re-purposed into micro-fulfilment hubs
- Shoppers tend to be attracted to a cluster of shops rather than make a visit to a single, standalone outlet, so as the high street's retail offering thins, remaining shops may need to regroup to attract shoppers' attention

B.9 KPMG's conclusions are: *"The structural challenges to city centres mirror the challenges facing transport networks post-COVID as the drop in footfall is reflected in falling passenger numbers. Fostering collaboration between businesses and local policymakers can help rethink the journey to work with a focus on lower carbon, more customer-orientated and better-connected transport networks. Other important areas include prioritising investment in high-speed broadband and 5G connectivity. As we leave the pandemic behind, hopefully sometime in 2021, towns and cities across the UK will need help and space to rethink the purpose of their centres. High streets will need to be reimagined as cultural and recreational hubs that will act as magnets for businesses and jobs able to transform less prosperous areas."*

C. The LEP's Key Sites report (March 2020)

C.1 Published at the start of the pandemic (and noting that the potentially significant consequences of COVID-19 made its recommendations even more pertinent) the Key Sites report was prepared against the background of the considerable loss of office and industrial floorspace over a 10 year period – some 7 million sq.ft. – with losses doubling in the last 5 years.

C.2 Other indices show however a general flourishing of the Herts economy over that period, with a 40% growth in the number of enterprises, a 25% growth in jobs, a 45% growth in GVA and a 8.5% growth in GVA per job filled.

C.3 Whilst these figures are encouraging, there are serious concerns about the ability to maintain growth unless there is a concurrent effort to stem employment space losses.

C.4 In terms of Dacorum The Key Sites report noted that:

- according to BRES data, Dacorum experienced an 8% growth in numbers employed within the district 2015 and 2018, just below the Hertfordshire figure of 11%

- Maylands Business Park (with a Gross Floorspace Area of 2,165,411 sq.m) is the largest employment area in Hertfordshire (the next two in size are 1,804,064 sq.m. and 1,308,978 sq.m.)

- The Business Park employed 18,800 people in 2018, 27% of all employment in the district (only 2 of the county's 18 key sites employ a greater proportion of the district total)

C.5 Whilst the report suggests that some pragmatism relating to the loss of employment space is necessary, in that it needs to be acknowledged that some of the floorspace lost in the recent past was outdated and/or poorly located. Additionally, modern technology can mean that future employment activity may need less permanent business floorspace, so the aim should be protect, enhance and extend certain spaces whilst accepting that lower quality provision can be lost.

C.6 The report stresses the action needed to stem and reverse the recent loss of employment space in the county by pursuing positive measures to promote the development and regeneration of Hertfordshire's 17 Key Employment sites, of which Maylands/East Hemel Hempstead is one.

C.7 The report's Strategy and Action Plan identifies bespoke measures required to deliver these benefits; the Maylands/East Hemel Hempstead key site is considered as a potential exemplar for other sites given the current focus on promoting a number of Hertfordshire's specialist clusters, advance masterplanning, dedicated resources to promote marketing and the pursuit of leading edge infrastructure investment.

Appendix 2: Dacorum's economy activity in a wider Hertfordshire context

D.1 It is essential to view Dacorum's economic activity not in isolation but as part of a fully functioning economic ecosystem operating within Hertfordshire. The county's economy is heavily defined by the scale and diversity of its scientific research and other knowledge-based assets that underpin the county's economic growth and prosperity. As a hub for scientific research, these Hertfordshire specific characteristics – generally considered to be strengths – focus primarily on a dynamic group of world-leading, research-intensive businesses – GSK, Airbus, MBDA, Roche, Eisai and Johnson Matthey as well as many others.

D.2 Around these and other major players, a series of overlapping innovation environments - characterised as clusters - have evolved. These are defined around 5 key sector specialisms:

- **Life sciences** including a major focus on cell and gene therapy in and around Stevenage, Welwyn Garden City and Hatfield
- **Advanced engineering and manufacturing** – which has as its heritage the defence industry operations such as that of BAe (formerly in Hatfield) but has now substantially broadened out and frequently has a strong IT and IA component
- **Smart construction** which is embracing the commercial opportunities resulting from adoption of new methods, materials and technologies across the construction industry, as it rapidly evolves to address the challenges of sustainability, accelerating housing delivery and skills constraints. This is supported by local - and global - sector leader BRE, part of the government funded Construction Innovation Hub consortium to lead national sector innovation over coming years
- **Agri-tech/science** involving the development of new technologies in agriculture, horticulture and the impact of climate change on farming, with the aim of improving yield, efficiency and profitability, where there are substantial crossover benefits and synergy to be derived from partnership with Rothamsted Research
- **Creative Industries**, particularly film and TV, with the presence of Leavesden Studios and Elstree Studios within the county

D.3 Overarching these specialisms is 'Green Employment' or 'Green Tech' – newly emerging investment in the green economy which has at its heart the imperative to reduce the impact of climate change and, more specifically, to achieve high levels of decarbonisation. Green Tech cuts across all employment activity and will increasingly be seen as the dominant business activity.

Appendix 3: Herts IQ aspirations and the actions being taken to support them

E.1 Hertfordshire Innovation Quarter - or Herts IQ - is the name for Hertfordshire's Enterprise Zone and was formerly known as the Herts Enviro-Tech Enterprise Zone. The term 'enviro-tech' - short for environmental technology - is no longer actively used in marketing of the site, although Herts IQ is actively targeting companies operating in environmental technology fields, particularly in agritech/science and smart construction. The targeting of these sectors is supported by the excellent sector leadership of Herts IQ partners Rothamsted Research for agritech/science, BRE for smart construction, and also the research and educational strengths of the University of Hertfordshire.

E.2 The Herts IQ Enterprise Zone was given formal designation by government in April 2017 and will operate over a 25 year period. It is output driven and has a target to deliver new jobs within a focus on the sector specialisms identified above.

E.3 Governance of Herts IQ is in the hands of a Partnership Board of seven organisations: Hertfordshire Local Enterprise Partnership, Hertfordshire County Council, St Albans City & District Council, Dacorum Borough Council, BRE, Rothamsted Research and the University of Hertfordshire. There is a high degree of commitment from partner organisations to delivering the agreed outputs and it is important that these objectives are maintained in all spheres, but particularly in the plan making process.

E.4 We would ask for the emerging Local Plan to support Herts IQ rollout through policies which stress the need for actions to support successful long term investment in key economic activities being promoted by Herts IQ partners. The keys to such success will be to require:

- top quality infrastructure and environmental standards to be adopted
- leading edge technologies put in place from the outset to support and promote investment (e.g. in the digital economy)
- investment to be secured in sector specialisms
- a high quality business offer to established and maintained through the avoidance of any activities that are likely to discourage investors[1]

E.5 To ensure achieve the above we consider a number of proactive measures are needed (and which Herts IQ is already pursuing) and these should be reflected in the Local Plan to reinforce messages the partners are promoting. These are as follows:

Actions

Commentary

The creation and maintenance of a robust marketing strategy

Already created and adopted by Herts IQ The Herts IQ brand was launched to market in March 2019 with a comprehensive marketing strategy to target and attract new (employers to the area. There is a team of three experienced sales and marketing professionals leading the Herts IQ project, and a pipeline of confirmed and potential new employers established

Strong governance measures to be established

In place. There is a structured delivery plan for the Herts IQ project, progress against which is reported to the Herts IQ Partnership Board each quarter. This includes reporting of the future occupier pipeline growth, and progress in the defined job delivery targets for the project

The need to secure a high quality upgrade to M1 Junction 8

The upgrade of M1 Junction 8 is a critical improvement needed to support both the delivery of the Herts IQ sites in and adjoining the Maylands Business Park (as well as the wider transformation of Hemel Hempstead through the Hemel Garden Community programme) (set to deliver 11,000 homes/10,000 new jobs).

The upgrade is expected to be delivered on land either within the ownership of the Crown Estate (TCE) or highway land. TCE and HIQ (supported by Hertfordshire LEP) are currently funding a design project in sufficient detail to enable the construction of the upgrade and related highway improvements to roll out East Hemel Hempstead and the development/regeneration of Maylands Business Park, both within Herts IQ and over a wider area

M1 Junction 8 improvements

A package of funding mechanisms are being explored including government programmes, developer contributions and 'in kind' funding

The need to pursue the longer term potential for the Herts IQ site to host the western terminus of the proposed Herts MRT by creating the Maylands Multi Modal Transport Interchange (MMTI)

Herts IQ at Maylands is proposed as the western terminus of the proposed A414 Corridor Strategy and the longer term proposal for a Mass Rapid Transport (MRT) scheme within it. The overall Corridor Strategy identifies a package of 30 separate proposals designed to improve E – W links across Hertfordshire (currently inferior to those running N – S) and encourage substantial modal shift changes to enable and complement the development of a proposed Mass Rapid Transport system.

The LEP would welcome the opportunity to create such infrastructure during the Plan period to increase this locations' attractiveness to investor and boost quality outcomes.

The additional Creation of an MMTI within the East Hemel Central site supports the recommendations of the 2017 Maylands Growth Corridor study in encouraging a significant modal shift. It will also provide a sustainable transport hub within the Herts IQ Enterprise Zone, acting as an interchange between various modes of transport, and supporting sustainable travel across the area as well as for 'last mile' journeys. Improving all transport modes including sustainable transport is a key success factor for Herts IQ as it will make its range of development sites more attractive to target occupiers.

Shorter term objectives pending the establishment of the MRT would include safeguarding the route and, potentially, the introduction of a short term dedicated bus service along its length until a higher specification system can be introduced

The opportunities to promote smaller scale transport initiatives to support development at Herts IQ

Maintenance and expansion of the SmartGo Maylands initiative beyond the current 3 year programme running to the end of 2022; the extension of the Nickey Line cycle route through development area; local us service improvements from development to site wider area as part of Hemel Hempstead town-wide bus service reconfiguration and including bus priority measures

Appendix 4: Maylands Business Development Sites Opportunities

F.1 We have identified 4 major employment opportunities at Maylands Business Park within Dacorum. All have the potential to add significant value to the objectives of Herts IQ and provide high quality jobs in key sectors, and all are identified sites within Herts IQ. The sites are as follows:

Development Site known as:

Size (ha)

Potential jobs

Opportunity identified

Spencers Park II

1.9ha

319

Requires amendment to current consent to establish 5,000 sq.m. office/lab/research /light industrial uses with a potential Net Zero Carbon build/eco design opportunity

Maylands 1

192

Potential for 1,200 sq.m. commercial space on lower floors of a residential development

Maylands 2

400

60 x lab / office units circa 72sqm each (meeting lab spec); Office / research / lab uses; flexible floorplates to respond to demand and 'new' working practices; collaboration environment;

conference and amenity facilities; NZC build opportunity

Maylands Gateway

6.48

Up to 1000

Aspiration is for a single environmental services companies on iconic corner location over time, mix of office/lab /storage spaces; 2 offsite manufacturers; 2 further units being targeted for environmental technology activities

Appendix 5: Promotion of Renewable Technologies in Herts IQ including development opportunities in Maylands Business Park

G.1 We would welcome the ESG making reference to the potential to champion the use of renewable energy technologies at Herts IQ in order to achieve significant levels of carbon reduction across the range of available development sites. The investigations into the potential of achieving this are ongoing stage but we would welcome the opportunity to discuss appropriate policy wordings with you before the draft Local Plan is published.

G.2 At present most decarbonisation opportunities are unrealised as stakeholders remain unaware of the potential benefits. The reality is that decarbonisation allows businesses to reduce both their energy costs and carbon emissions, governments and local authorities to meet targets for decarbonisation and air quality, grid reinforcement to be deferred, and energy capture and storage units to help drive the government's wish to promote energy decentralisation.

G.3 The studies we are undertaking at Herts IQ are expected to offer the opportunity for low or possibly zero carbon development, contribute to the UK meeting its carbon reduction obligations, provide a powerful marketing tool and have the potential to serve as an exemplar to other developments, including regeneration projects within the borough. For this reason we would wish to pursue all opportunities to make a positive statement within the Local Plan.

G.4 Depending on the timing of the completion of our investigations and the timeframe for the Local Plan there is the possibility for the outcome of our investigations to influence future Local Plan policies for Maylands Business Park and, possibility, climate change obligation policies.

Appendix No.6: Sector demand studies at Herts IQ

H.1 Herts IQ is currently engaged in studies into likely investor demand for development sites in Herts IQ and the influence that could be brought to bear on this, with the aim of both maximising outcomes for jobs and sector clustering whilst ensuring maximum returns to landowners and developers.

H.2 This work will undertake a detail appraisal of both the available sites and the commercial market, one that will take account of all the impact that various elements – the pandemic and Brexit, but also a range of other factors – for both now and in the future.

H.3 Working with a detailed evidence base, market research and stakeholder interviews this study is looking at the local, national and sector context, demand factors and an assessment of likely future trends.

H.4 Currently this research remains commercially sensitive and therefore confidential and it is uncertain how much if any of the conclusions can be released into the public domain, if any. If however this is possible we would welcome to consider the ways in which this might inform Local Plan policy.

1 Additional Context – Expanded policy research

- We ask that the emerging Local Plan be appropriately informed by additional policy research which underpins a number of critical employment related These are summarised in Appendix 1 but relate to the following:
- Herts LEP - The Herts Economic Recovery Plan (August 2020)
- KPMG – The Future of Towns and Cities in the UK Post Covid-19 (January 2021)
- Herts LEP - Hertfordshire Key Sites Report (March 2020)

1 Additional Context – Dacorum’s employment activities in a wider context

2.1. We think it important to provide a wider context to Dacorum by covering some Hertfordshire wide indicators of key sector strengths which add significant value to the Hertfordshire economy. These are set out in Appendix 2.

- 1 Herts IQ including Maylands – Herts IQ aspirations and initiatives to promote high quality investment in key sectors
- Appendix 3 sets out the aspirations of Herts IQ to create quality outputs and the measures that are being put in place to underpin these.

1 Herts IQ aspirations for specific Maylands Business Park Development Sites

- In Appendix 4 we list the development sites critical to meeting Herts IQ

1 Decarbonisation initiatives through use of renewable energy – a possible exemplar based at Maylands Business Park

- Herts IQ is currently progressing initiatives in relation to this; such details as can currently be provided are set out in Appendix 5.

1 Sector demand studies at Herts IQ

- Herts IQ is currently engaged in studies into likely investor demand for development sites in Herts IQ and the influence that could be brought to bear on this; such details as can currently be provided are set out in Appendix

B. KPMG – The Future of Towns and Cities in the UK Post Covid-19 (January 2021)

- A number of commentators are starting to visualise what the UK and indeed the wider world will look like when (or possibly if) the Covid-19 is eradicated or brought under Any studies at this time must be heavily caveated, as simply nobody can know when that can be and also cannot be certain what any recovery will ‘recover to’ – it is probably safe to assume there are numerous parallel scenarios that can be conjured up.

B.2 Additionally, we should perhaps recognise that Covid-19 is potentially being used as a ‘piggy back’ of changes in policy, funding support etc that landowners, businesses and developers were already pushing for to serve their own and their clients’ interest.

- The KMPG study starts with a broad assessment of the changes in business practices the pandemic has wrought, with a broad assessment of implications. It is not backed up by detailed evidence but provides a useful perspective from a major company that is experiencing first-hand the implications of the virus in real time along with other The study concludes the following:

- foregoing most business travel allows companies to save costs and gave workers more time to focus on their core tasks, potentially making them more productive
- The proliferation of virtual meetings also enabled broader access to specialist advice and analysis is now almost always available anywhere in the world at short notice (and at much less expense as travel costs and travelling time are avoided)
- Suspending the daily commute enables workers to save time and money, allowing many to work more flexible
- However an obvious downside of this is a blurring between work and home life
- The deep recession triggered by the pandemic has squeezed profit margins across a swathe of businesses, with companies responding in part by reducing property commitments, sometimes significantly
- Some businesses, (including, KPMG notes, its own) have gone down the route of transforming their offices into collaboration hubs, where many workers will come to meet rather than sit at a desk and perform tasks
- Surveys show that most workers would prefer to return to a hybrid mode of work combining days with clients and colleagues in the office and days at home
 - KPMG then considers the implications of this in relation to towns and The report notes a corresponding collapse in retail activity in these locations but does not go into the post Covid-19 implications of this directly; instead, it focuses on what it thinks are the likely decline in town centre jobs, as it considers that many of the changes identified in B.3 above are irreversible (or only partially reversible).

B.5 Based on its analysis (which is not set out in the report) of 109 towns and cities, Hemel Hempstead is joint equal (with another new town, Bracknell) in standing to lose the most town centres jobs – 27.4% in all. Other South West Herts towns also suffer disproportionately, with Watford 4th and St Albans 19th in terms of highest losses.

- When other impacts are factored in – the loss of retail jobs due to online shopping increases sustained post pandemic and what KPMG calls ‘the strength of cultural offering’ (the presence of existing facilities such as sports facilities; culture and recreation assets (ranging from amusement parks to museums and performing arts venues); and hospitality venues (including restaurants, cafe, pubs and bars), Hemel Hempstead stands to be the second worst affected of all 108 towns and cities

B.7 The KPMG take on this is that whilst food retail rents will remain high, non-food retail rents will fall substantially, opening up prime town centre space for conversion to higher education, community and residential uses.

B8. In terms of impact of online shopping, the report suggests the following:

- Online sales have grown by 50%+ in nine months to January 2021, accelerating a trend that would have taken five years plus to deliver in normal circumstances.
- It is expected that 40-50% of all non-essential retailing will be transacted online going forward, up from around 30% pre-COVID. This is just a continuation of a trend that has seen over the last 10 years

Included files

Title

Question: Evidence Base

ID	EGS12038
Person ID	1269358
Full Name	Mr Tim Duggleby
Organisation Details	Associate Director Redevelopment Programme West Hertfordshire Hospitals NHS Trust
Agent ID	1269359
Agent Full Name	Mr Tom Rudd
Agent Organisation	BDP
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>The Trust confirms the statement included in the draft Infrastructure Delivery Plan (2020) which states: “Hemel Hempstead Hospital will provide an urgent care facility, diagnostic services and be developed as a specialist centre for planned medical services. The current site will be reconfigured to concentrate services into a smaller footprint, allowing part of the site to be released for development.</p> <p>In September 2019 the Trust was informed that it had been included in the list of hospitals to receive funding under Phase 1 of the Department of Health & Social Care (DHSC) Health Infrastructure Plan (HIP). Works funded under the scheme were scheduled for significant delivery in the period 2020 – 2025.</p> <p>WHHT will now work with DHSC and its NHS regulators to determine the detailed plan and programme for the development of its sites.”</p>
Included files	
Title	Question: Evidence Base
ID	EGS12044
Person ID	1269361
Full Name	Dr Freya Rumball
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS12050
Person ID	330363
Full Name	Mr. Graham Lay
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS12080
Person ID	1269372
Full Name	MATTHEW SPEED
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS12093
Person ID	1269386
Full Name	KERR LINDA
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	No compensation tool is mentioned for the proposed development of Green Belt Land.
Included files	
Title	Question: Evidence Base

ID	EGS12109
Person ID	1145854
Full Name	Mrs Deborah Doughty
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS12137
Person ID	1269413
Full Name	Mr Chris Wallis
Organisation Details	Hon. Director of Development Tring Sports Forum
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p><u>Comments on Draft Dacorum Infrastructure Delivery Plan, November 2020</u></p> <p><u>Section 13, Green Infrastructure</u></p> <p>13.10 – 13.15 We should be very grateful if you could tell us how the calculations pan-out in terms of extra pitches for each sport and Club by using your calculator, so that we can check-them and make-sure these are included in the Masterplan? We point-out that some mini-rugby pitches will be lost and some Tornadoes pitches have already been lost because of extra car-parking spaces required.</p> <p><u>Summary</u></p> <p>TSF member clubs, having total memberships of 2500 senior and 2000 junior members currently operate to or above capacity. ANY extra housing in Tring will completely over burden existing facilities. The Draft Local Plan should not only make reference to “a sports hub” but should specify the amount of additional sports facilities/space to be provided (using the methodology identified in the Plan.) This calculation should also recognise the current shortfall in provision, especially at junior level at cricket, football and rugby.</p> <p>Logic suggests, additional multi- sports space should be sited adjacent to the two existing sports hubs – Tring Cricket/ Tennis/Hockey/Lacrosse Clubs and Pendley Sports Centre (Football/Squash/Bowls/Rugby.) Should this result in the Dunsley Farm location becoming “over developed”, a further hub should be centred on the East of Tring proposals.</p>
Included files	
Title	Question: Evidence Base
ID	EGS12140
Person ID	1269413
Full Name	Mr Chris Wallis
Organisation Details	Hon. Director of Development Tring Sports Forum
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	As mentioned in our reps., we believe, due to local knowledge, that the Playing Pitch Strategy is becoming dated - to the best of our knowledge it is not being updated annually. This situation needs to be addressed urgently, then annually - we suggest a meeting DBC/TSF/KKP as soon as possible.
Included files	
Title	Question: Evidence Base
ID	EGS12153
Person ID	1160677
Full Name	Mr Paul Doughty
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>

Included files	
Title	Question: Evidence Base
ID	EGS12170
Person ID	1269444
Full Name	Mr & Ms Jim & Katie Barnard & Partridge
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p><u>Do you agree that the evidence base that accompanies the plan is adequate, up to date and relevant?</u></p> <p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently negatively impact our landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS12180
Person ID	1269448
Full Name	Mr John Mardell
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS12190
Person ID	399285
Full Name	Mr John Roberts
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	The evidence appears to be based on 2014 ONS data rather than more recent 2018 estimates. The risk to Berkhamsted as a desirable "Market Town" as some Estate Agents call Berkhamsted will be disastrous. The huge increase in planned houses in Berkhamsted of 25% increase is ridiculous, with out any consideration to the existing infrastructure.
Included files	
Title	Question: Evidence Base
ID	EGS12203
Person ID	1145481
Full Name	Mr Brian Kazer

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>Number of Houses for Tring</p> <p>The number of houses stated in the Plan is higher than the number from ONS 2018 population projection data. That needs to be rectified.</p> <p>Topic Papers. Site Selection section 2.20</p> <p>Regarding Tring, the Local Plan has concluded that land is needed to be released from Green Belt. However there is no clear statement on how compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.</p>
Included files	
Title	Question: Evidence Base
ID	EGS12227
Person ID	1269476
Full Name	EMILY DAVIES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit will no doubt continue to decrease this projection.
Included files	
Title	Question: Evidence Base
ID	EGS12247
Person ID	1269479
Full Name	BARBARA HARVEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base

ID	EGS12258
Person ID	1269482
Full Name	LOUISE JOHNSON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The vision and strategic objectives are flawed in the sense that local and national government should be looking outside the southeast for business and household development.
Included files	
Title	Question: Evidence Base
ID	EGS12263
Person ID	1227654
Full Name	Mrs Margaret Warman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	Reports are out of date. Population growth is changing for many reasons, Brexit included. So are shopping habits. Something as important as trashing an AONB needs to be based on absolutely up to date reports.
Included files	

Title	Question: Evidence Base
ID	EGS12272
Person ID	1264925
Full Name	sharon warner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon out of date ONS projections.</p> <p>The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit will no doubt continue to decrease this projection.</p>
Included files	

Title	Question: Evidence Base
ID	EGS12290
Person ID	1269485
Full Name	NICOLA HULSE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's

assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files	
Title	Question: Evidence Base
ID	EGS12295
Person ID	1269487
Full Name	PAM MEGAW
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS12304
Person ID	1269488
Full Name	SAMANTHA SMITH
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The Council has based its calculations on outdated Data, resulting in an overestimate of housing.
Included files	
Title	Question: Evidence Base
ID	EGS12338
Person ID	1264637
Full Name	Ollie Parrish
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>

Included files	
Title	Question: Evidence Base
ID	EGS12357
Person ID	1269489
Full Name	STEVE HILL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	The Berkhamsted Residents Action Group (BRAG) has responded in full to the consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.
Included files	
Title	Question: Evidence Base
ID	EGS12368
Person ID	1269491
Full Name	Mr David Eeley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's

assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files	
Title	Question: Evidence Base
ID	EGS12374
Person ID	1269492
Full Name	Mrs Isabelle Gorton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation</p>

is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS12396

Person ID 1164091

Full Name R.J. Hollis

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

The plan uses housing calculations based on out of date guidance, 2014 instead of 2018.
There is clear evidence of areas that the government states are to be protected, but the plan makes no use of this.
The plan is published before the SAC survey evidence is available.
There is evidence from the ONS housing need figures that we need far fewer houses than proposed but this is not used to counter the calculated numbers.
The Covid pandemic has caused changes in working practices which will become permanent. In a far reaching plan, this should be researched and included before the plan is finalised.

Included files

Title Question: Evidence Base

ID EGS12405

Person ID 1269497

Full Name MICHAEL RUDIN

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The council's Green Belt assessment is not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework and the internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>The council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS12422
Person ID	1269503
Full Name	Mr Jan Wosiek
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I DO NOT agree that the evidence base supporting the plan is adequate or up to date.

Just a general comment in that bearing in mind, the Government's method of calculating housing need has been discredited, the number of dwellings required within Dacorum should reduce, hence some sections within this document need re-writing for accuracy.

Included files

Title Question: Evidence Base

ID EGS12447

Person ID 1146040

Full Name Mrs Rachel Macdonald

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:

- Climate Change and Sustainability SPD,
- Detailed Design Guide SPD
- Climate Change Strategy and Action Plan
- Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers

Included files

Title Question: Evidence Base

ID EGS12455

Person ID 1145994

Full Name Penny Mould

Organisation Details Spatial Planner- Beds, Bucks and Herts
Highways England

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>Strategic transport modelling</p> <p>There are two modelling reports that form the current transport evidence base for the ESG; the ‘2036 COMET Dacorum Local Plan Scenario’ (April 2018) and the ‘Dacorum Local Plan Strategic Transport Modelling Report’ (May 2020).</p> <p>2036 COMET Dacorum Local Plan Scenario (April 2018)</p> <p>The ‘2036 COMET Dacorum Local Plan Scenario’ (April 2018) reports on the previous COMET modelling undertaken for the emerging Dacorum Local Plan. The modelling work reported within the 2018 report includes Dacorum forecast growth up to 2036 (as forecast in 2017); however, all housing, employment and infrastructure inputs for all other HCC districts remain at 2031 levels. Therefore, Highways England have not interrogated the 2018 modelling document in any further detail as part of this response, instead focusing on the more up-to-date modelling that has been undertaken (reported within the May 2020 modelling report).</p> <p>Dacorum Local Plan Strategic Transport Modelling Report (May 2020)</p> <p>The purpose of the May 2020 modelling report is to present the steps taken to produce the 2036 forecast scenarios, present a summary of results across Dacorum’s highway and public transport networks, and to provide the evidence base on strategic transport modelling which DBC can use to inform their final recommendation on the development strategy of the new Local Plan.</p> <p>The modelling assesses the impact of the additional Local Plan allocations within Dacorum up to 2036 in conjunction with anticipated transport infrastructure in the current version of the COMET transport model.</p> <p>Section 1.2.3 of the May 2020 modelling report sets out the preferred option in terms of Local Plan growth across Dacorum was when the ‘Dacorum Scenarios’ modelling was undertaken. It states that the preferred scenario was based on the Objectively Assessed Need (OAN) of around 1,025 dwellings a year (18,450 total new dwellings between 2018-2036). This is higher than that which is set out within the Emerging Strategy for Growth (ESG) and although it is acknowledged that given this, the COMET modelling results are likely to offer a robust forecast it is recommended that the strategic modelling should be updated to reflect the housing and employment growth figures within the final preferred scenario once known (currently 922 per year within the ESG). The updated modelling should also reflect the most up to date growth forecasts for all Hertfordshire districts and neighbouring authorities.</p> <p>As part of the May 2020 modelling, four scenarios were tested;</p> <ul style="list-style-type: none"> • Dacorum Baseline 2036); • Additional Allocation (2036); • Scenario 1 (2036); and

- Scenario 2 (2036).

The model report does not provide a 2036 model with background growth only, just scenarios with Local Plan development included. Therefore, Highways England are unable to undertake a comparison to determine the impact of Local Plan development over and above the background growth scenario.

The modelling undertaken demonstrates;

- Increased delays at M25 Junction 20 of over 5 minutes
- Notable increases in flows along the east Hemel spine road to access the M1 Junction 8
- Notable increases in flows along M1 southbound in the inter peak
- Notable increases in flows along M1 southbound from Junction 10 to the M25 in the PM peak
- Notable increases in flows along M1 northbound to access Hemel Hempstead from the east via Junction 8 during the PM peak
- Re-routing of traffic towards M1 J8 as a result of the new northern link road

Highways England therefore suggest that further consideration is needed by the Council as to how the impacts of the Local Plan's growth will be mitigation with regards to its impact on the SRN.

Included files	
Title	Question: Evidence Base
ID	EGS12456
Person ID	1145994
Full Name	Penny Mould
Organisation Details	Spatial Planner- Beds, Bucks and Herts Highways England
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	Draft Dacorum Infrastructure Delivery Plan (November 2020) The purpose of the Infrastructure Delivery Plan (IDP) document is to set out the infrastructure required to create quality sustainable places and support the delivery of the local plan growth (housing, employment etc.) in Dacorum Borough.

The IDP categorises infrastructure need and Chapter 9 'Highways and Transportation' is of relevance to Highways England. This chapter repeats the transport modelling that have been discussed earlier with similar conclusions that a mitigation will be required for M25 J20 and at M1 J8. Highways England consider that more detailed modelling at each of these locations will be necessary to clarify the extent and timescale of future mitigation schemes at these locations.

Included files

Title Question: Evidence Base

ID EGS12457

Person ID 1145994

Full Name Penny Mould

Organisation Details Spatial Planner- Beds, Bucks and Herts
Highways England

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

Dacorum Local Plan Transport Evidence Base Transport Topic Paper (November 2020)

The Dacorum Local Plan Transport Topic Paper (TTP) forms part of the Transport Evidence Base for the Local Plan and provides a summary of the transport evidence base prepared to date for the ESG, including the package of transport interventions developed to support it.

Section 4 of the document concludes with a summary of the key mobility issues, with those of relevance to Highways England being congestion around Hemel Hempstead along the A414, A41 and M1 and Kings Langley on the approach to the J20 of the M25 on the A41.

Although the TTP has been produced to support the Local Plan, it has used a different COMET model run to that supporting the Local Plan evidence base. Highways England would therefore suggest that the future Local Plan modelling scenarios use LP5 COMET model.

The modelling results broadly reflect the high-level findings determined from the modelling reported within the May 2020 modelling report. Therefore, as mentioned earlier due to the close proximity of the North and East Hemel Growth Areas to M1 Junction 8, and the likelihood of increased delays at M25 Junction 20 as a result of Local Plan growth, Highways England recommends that detailed capacity assessments are undertaken at M1 J8 and M25 J20 to fully understand the impacts of the proposed local plan growth at these locations.

Section 7 of the TPP provides a review of some of the existing emerging transport schemes (drawn from a review of several strategies including the Herts LTP4, Greater Hemel Strategy, South West Herts Growth and Transport Plan, Hemel Gardens Communities Transport Plan) to determine how far they go to deliver the set LP goals and objectives. Those schemes considered to potentially be of relevance to Highways England include:

- East Hemel Link Road;
- M1 Junction 8 Update;
- A414 Junction 8 Cycle Bridge;
- A414 Highway Improvements;
- Maylands Access Upgrades (Package 2);
- Hemel Hempstead – Luton Corridor (Package 3);
- Watford – Hemel Hempstead Corridor (Package 6).

The TPP states that additional capacity at M1 Junction 8 is needed but that this should be targeted to provide reliability and journey time advantage for public transport and essential operational capacity to Maylands. It is important that any new infrastructure provides prioritisation to public transport and active modes to achieve the ambitious mode share aspirations. It should therefore be noted that any proposed junction and highway layout amendments at M1 Junction 8, such as bus priority measures, should be designed in a manner will not have a detrimental impact on the operation and safety of the junction and SRN.

Highways England should also be consulted on any non-highway related schemes as set out in Sections 7 and 8 of the TPP (i.e. cycle bridge proposals at M1 J8, bus priority measures or lorry parking/ routing proposals etc.) that cross or run within the vicinity of the SRN, so that it can be ensured that evidence is provided that the Highways England network will not be adversely impacted.

In the meantime, if you have any queries with regards to the comments made above please do not hesitate to contact me

Included files	
Title	Question: Evidence Base
ID	EGS12479
Person ID	1269523
Full Name	RORY LUMSDON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	

<p>* Yes</p> <p>* No</p>	
<p>QUESTION: Evidence Base comment</p>	<p>The Emerging Strategy for Growth appears to be based on selective strategy documents* that have no formal planning status and which have not been widely consulted on. As a result, the Strategy has failed to take account of a number of important issues - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs. The pursuit of economic growth as promoted by the Hertfordshire Local Enterprise Partnership and implied by background work for a South West Herts Joint Strategic Plan, should be balanced against environmental concerns and climate obligations before they are tested through the local plan process.</p> <p>*Dacorum Growth & Infrastructure Strategy to 2050, Dacorum Corporate Plan 2020-2025 and Corporate Action Plan</p> <p>The Strategy fails to take into account the combined impacts of the coronavirus pandemic and recently expanded permitted development rights, both of which create many more opportunities for conversion of commercial space (especially office and retail) to residential use, and thus windfall provision of housing throughout the Borough is likely to be much higher than estimated. A more positive place making strategy is needed as part of a formal brownfield land review to realise local enhancement of the existing built environment with benefits for existing residents. This will ensure much greater emphasis should be given to regeneration of previously developed land in order to reduce the amount of housing and employment development on Green Belt and other greenfield sites outside of existing towns and villages.</p> <p>Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan. Dacorum Borough Council declared a climate emergency more than a year ago. Despite this and some well-intentioned promises, the Strategy as published clearly prioritises economic growth and greenfield land development over considerations for the climate emergency. In so doing, it has failed to take account of legislation and recommendations from various UK bodies on how carbon reduction plans have to be integral to the development of local plans. Words of 'encouragement' are insufficient and no substitute for detailed carbon budgets and committed targets of local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF) and the 2004 Planning & Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050 and this work should underpin a revised land use and development strategy.</p>
<p>Included files</p>	
<p>Title</p>	<p>Question: Evidence Base</p>
<p>ID</p>	<p>EGS12482</p>
<p>Person ID</p>	<p>1269523</p>
<p>Full Name</p>	<p>RORY LUMSDON</p>
<p>Organisation Details</p>	
<p>Agent ID</p>	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	The numbers are questionable. The government initially based the numbers on a formula now known as 'The mutant algorithm'. In December the government announced it would ditch this algorithm — many reasonably thought that the proposed numbers in the local plan would therefore fall. Despite this, the government changed the statistics to justify the numbers anyway, and the number of proposed houses therefore increased. This is ridiculous.
Included files	
Title	Question: Evidence Base
ID	EGS12496
Person ID	1269524
Full Name	DAVID ATKINSON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS12501
Person ID	1269525
Full Name	QUENTIN HALFYARD
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS12513
Person ID	1269527
Full Name	JULIAN SMITH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>

Included files	
Title	Question: Evidence Base
ID	EGS12523
Person ID	1207806
Full Name	Mr Chris Graebe
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS12578
Person ID	1261562
Full Name	Sally Symington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	The following could be updated: Dacorum's habitats and species – Hertfordshire Biodiversity Action Plan, A 50 year Vision (2006) Green Infrastructure Plan (2011)

There is no Climate Change and Sustainability SPD.

Included files

Title Question: Evidence Base

ID EGS12584

Person ID 1269559

Full Name Ms Jessica Giolda

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

Included files

Title Question: Evidence Base

ID EGS12597

Person ID 1269561

Full Name Mr & Mrs Martin & Tracey Martin & Tracey Read

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South</p> <p>East as they can now work remotely.</p> <ul style="list-style-type: none"> • There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape. • The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the • There is no agriculture strategy
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Included files	
Title	Question: Evidence Base
ID	EGS12674
Person ID	1145844
Full Name	Dr and Mrs Melvyn Else
Organisation Details	
Agent ID	979742
Agent Full Name	Mr Robert Love
Agent Organisation	Senior Planning Associate BIDWELLS
Yes / No * Yes	

QUESTION: Evidence Base commentReview of Council's Previous Assessment Work

The Policies Map for the Dacorum Borough Local Plan 1991-2011 did not previously identify the site as an Open Land designation.

Following adoption of the Core Strategy by the Council in 2013, the site was identified as an Open Land designation in the Site Allocations DPD which was adopted in 2017.

As part of the Council's initial preparation of the Site Allocations DPD, a total of 25 sites were considered for a new Open Land designation within the Borough as part of the Site Allocations Background Issues Paper (June 2015) (SABIP). Edgeworth House represented the only site of 5 considered in Berkhamsted that was progressed towards an Open Land designation.

It was clear from the level of dismissed sites that the criteria required to justify an Open Land designation was high. As noted in the SABIP, the criteria included a size threshold of 1ha; the consideration of proposed uses of the site; and built form.

Edgeworth House is referenced in a number of documents forming the evidence base for the Core Strategy and associated Site Allocations DPD documents. There is a marked inconsistency in how the Local Authority has considered the site and various conclusions drawn relating to Edgeworth House. These are documented below:

- 2006 – Strategic Housing Land Availability Assessment (SHLAA) documents notes the site as appropriate for circa 11 dwellings under site BW/9.
- 2008 – Open Space Study notes that the opportunity could be taken to include part of the Edgeworth House site closest to the canal as open land
- 2013 – the adopted Core Strategy defines Open Land as areas greater than 1ha. The Edgeworth House Garden closest to the canal measures only 5700sqm. The other land in the gardens of Edgeworth House was added to achieve the 1ha threshold
- 2014 – The Site Allocations Background Issues Paper considers the site and makes the following comments, *“The green space here forms the back garden of the dwelling and **not appropriate to allocate as Open Land**. Site also affected by watercourse and floodplains, meaning scope for development may be restricted. 1.6 ha.”* This conclusion would note that the site should not be allocated as Open Land
- 2015 – The Site Allocations Background Issues Paper, notes the following comments in relation to the site, *“The green space here forms the back garden of the dwelling and extends 1.6Ha. Site affected by watercourse and floodplains, but land contributes to urban form, would extend the existing green/ corridor/ Open land associated with the canal and enhances the character of the listed building.”* The previous comments from the 2014 study are simply dismissed with very limited explanation other than, an error was made. My client also considers the Council was in breach of its obligations throughout the earlier phases of the above procedure of putting the site forward as Open Land since at no point did they advise the owners of Edgeworth House of their intentions or proposals. Furthermore, contrary to what the Council has said there appeared little or no real support for designating Edgeworth

House as Open Land in 2017 outside the Council. The garden at Edgeworth House appears to be the only private garden land in Berkhamsted classified this way.

The previous work undertaken by the Council identifies clear inconsistency in the comments noted across the assessments and highlights the lack of justification for the continued designation of Open Land and lack of real technical input into the assessment.

The assessments provide a reasonable identification of the positive elements of the site; the open nature at the northern edge close to a water environment of high habitat value; the absence of built form and the presence of trees that contribute to the urban environment. However, the assertion in the assessments is that the Open Land allocation will form an extension the wider designation; provide a buffer between residential and employment uses; and enhance the setting of the Listed Building are all false. The designation of Open Land makes no change to these matters. The habitat of the canal green corridor will not be extended and is already there in situ.

The protection of habitat; setting of the Listed building and protection of any TPO (Tree Protection Orders) trees can be maintained through normal planning control. Furthermore, the exclusion of garden land from the definition of previously developed land in the NPPF reinforces this position; protection from unsuitable development, and focus to maintain important landscape features is ensured.

In summary to the previous assessment work undertaken by the Council, there have not been any substantial reasons given to how the Open Land designation of the site at Edgeworth House shall contribute to the provision of genuine Open Land within Berkhamsted.

Included files	
Title	Question: Evidence Base
ID	EGS12689
Person ID	1269544
Full Name	Ms Lindy Foster Weinreb
Organisation Details	Chairman Berkhamstead Citizens Association
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	

**QUESTION: Evidence
Base comment**

A Housing numbers

We note the discussion provided in Topic Paper 'Development Strategy November 2020': this tracks the history, marshals the data and argues that the dwelling numbers for the Reg18 Plan meets the housing needs for the Borough viz 922 [or recently 1023] pa. We dispute this is the correct basis for the Plan – which is based on 'national requirements' rather than local needs.

The paper includes a comment 6.7:

Below we set out data drawn from reliable sources e.g. ONS and the study commissioned by the Districts' Joint Housing Needs Assessment quoted in the Plan.

The current dwelling numbers established in the Adopted 2013 Core Strategy sets an annual build rate of 430 pa.

- The Data shown in Fig 2 Housing Trajectory 2020 – 2038 [p 38] records anticipated completions across the Borough for 2020/21 as **654** and 21/22 as **1036** . These are well in excess of the Core Strategy and also the numbers projected by

The numbers set for the Draft Plan have been based on the ONS projections of housing 'need' but manipulated by a formula adopted by MHCLG to determine the 'national requirements' stated in Para 6.7 above.

Dacorum

ONS projection of Dacorum annual housing growth

After adjustment by MHCLG

algorithm

After adjustment by MHCLG

algorithm

ONS 2014

730

1023 [new standard applied]

ONS 2018

355

922 [mutant applied]

497 [new standard applied]

As a result, we object to the adoption by the Borough of the Ministry's numbers: a lesser number to meet the assessed local needs must be agreed upon. This must lead to a revision of the site allocations and a new Plan.

We note the data in Table 6 Affordable Housing Need across South West Hertfordshire [page 62] indicates an assessed need of 611 dwellings pa.

DACORUM

Rented affordable

housing

363

Affordable Home

Ownership

248

TOTAL

611

We also note that the Borough assumes a continuing policy of requiring 40% of new dwellings should be allocated as 'affordable' on Growth Areas [viz Green Belt], with 35% in the urban area of Hemel Hempstead and 40% elsewhere [DM 1 para a.]

For an area with acute need for homes at 'social rents' [see Para 14.29 et seq p 62] should the proportion not be increased to 50 or 60%?

This would change the market dynamics and deliver a better share to the community of the uplift to land value following the release of (mainly) Green Belt land and consent to development.

Title	Question: Evidence Base
ID	EGS12690
Person ID	1269544
Full Name	Ms Lindy Foster Weinreb
Organisation Details	Chairman Berkhamstead Citizens Association
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>We note the statements in the NPPF Para 11: <i>Plans and decisions should apply a presumption in favour of sustainable development.</i> <i>For plan-making this means that:</i></p> <ol style="list-style-type: none"> 1 <i>plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;</i> 2 <i>strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:</i> <ol style="list-style-type: none"> 1 <i>the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or</i> 2 <i>any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a "</i> <p>We have previously said we remain unpersuaded on the assumptions made that lead to the number of dwellings proposed to be built over the Plan period. There is an assumption in the Draft Plan that there is demonstrable benefit that outweighs the disbenefits of the proposed release of land from the Green Belt. We dispute that this is the case certainly around Berkhamsted and Northchurch where sub para i and ii should take precedence and be applied.</p> <p>Comments such as sustaining vibrancy etc are not accompanied by evidence to support the argument.</p> <ul style="list-style-type: none"> • Maintaining supply and delivery • Para 73 includes the comment: <i>Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement</i>

set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

This invites the question on what is the appropriate number for the local housing need: in this Borough the need is for dwellings at 'affordable cost' or 'social rent'. The footnote 37 [Page 20] states:

Where local housing need is used as the basis for assessing whether a five-year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.

This introduces a contradiction and conflates open market housing supply with housing need. This leads to a further increase of dwelling numbers, in excess of what the ONS data is projecting, and locally, to significant demand for Green Belt land release beyond the urban capacity.

The strategic policy adopted in 2013 sets an annual requirement of 430 dpa; the 'local housing need' may be greater than this number, but even so that is larger than the number projected from the 2018 ONS data.

The Draft Plan sets out to meet the stated number of dwellings as required or calculated by the 'standard method' determined by the Ministry, with a modest buffer. Para 19.6 and 19.7 of the Draft Plan make reference to Para 136 of the NPPF viz:

Until the adoption of the Draft Plan, the final sentence should read:

It is proposed to release Green Belt land to enable the delivery of the spatial strategy for Dacorum.

First Dacorum has to 'prove beyond doubt' that "exceptional circumstances" exist to allow the release of Green Belt, which Berkhamsted Citizens remain vehemently opposed to.

F Para 137 says:

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- 1 makes as much use as possible of suitable brownfield sites and underutilised land;***
- 2 optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and***
- 3 has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common***

other locations well served by public transport'.

We look forward per sub para c) to learning whether discussions with neighbouring authorities prove fruitful.

Public Transport – in General

What an operator would like, and many passengers.

A service that goes directly from your origin to destination, with minimum stops, very fast, maximum loading.

The challenge is getting all passengers in one place in the first place. So most public transport ends up with a lot more stops and uneven loads.

Most railways were laid out before the houses, so tend to fit this description. It is not easy to move railways. There is a problem though, when planner and developers build houses a long way from stations which makes the train less attractive. There is still the stopping pattern problem i.e. too many stops makes the journey slow and unattractive.

Buses have a different problem. When we layout housing estates, we do not think about the bus services. So, they often have to follow the road network, which can make the route structure inefficient. To make a route viable, it must cover many houses, but this often means the route must go “round the houses” a long and winding route, with many stops and lots of detours. The resultant journey is so slow, many people shun the bus and use the car.

So, we need to design new housing estates with a road layout which encourages bus, tram and train use.

When creating new housing, the residents need new services, such as Schools, Health care (doctors and hospitals) and shops, not just transport. There are some key differences though. The other services can be retrofitted to a housing estate. Good public transport must be designed in from the start. For all other services, you need transport to get to them. So, must be designed with transport in mind.

When choosing where to live we have to consider a number of factors, many of them are determined by transport.

- A large proportion of households have two adults working. If they are working, they need to get to work.
- If the house is for a family with children, in most cases they will need to get to school. Often they will be at the same school, but not always.
- The size and cost of house can affect the type of transport Can a house be afforded on 3 times average local wages? Possibly with 2 adults working this could be higher. If they cost more than this, then at least one adult will be traveling a longer distance to a higher paying job. This could be by train to London or by car somewhere else. If they use the train, they will need to get to the station from their house.

If the house is within a mile of the station on the flat, then walking is easy and can be assumed. If it is further away or up a hill walking will be less attractive. Over a mile or with a steep hill then walking will not be common. Some people will cycle, providing there is secure storage at the station.

There is a challenge with a bus, as you need the bus to connect with the train. Sufficient time must be allowed, to get from one, to the other. Time must be allowed in case one is late. But if it is too long it adds to the overall journey time. This makes public transport less attractive.

When public transport is attractive many people will choose it over the car. But when public transport is too slow, unreliable or undependable people will revert to their cars. In most cases where people have the resources to buy a house, they will also have the choice of using a car. The car will be the default option if the alternatives are not designed to be attractive.

For each household, one adult will create 1 return trip from home to work. For each school visited it could result in 2 return trips a day if in a car.

The question is which mode of transport will be used. This must be planned in when the house is built. Is it practical (safe, secure and easy) for a child to walk or cycle to school? If not then they will normally end up in a car.

Other journeys will also be undertaken by households; however, this paper focuses on the journeys that happen daily and will therefore cause the highest volume of traffic.

Therefore, it should be mandatory for all housing development to have a transport plan to address where the people who live in the houses will; work, go to school etc. Then determine how they will get there, then how the existing and planned new infrastructure will handle it. If this plan is inadequate the proposal should be rejected. It should also address wider issues such as climate change i.e. the carbon produced by the transport, should be included in the carbon budget for the development as a whole.

This paper focuses mainly on the transport need of housing for sale, not rent. However, many of the issues apply to social housing as well as private housing. However, the choices facing people who cannot afford a car, can be different. They are forced to use public transport. But their need for good public transport are often greater.

Everyone's quality of life is determined by the income they can obtain, less the cost of housing and the cost of travel between housing and work.

If you are on a low income, dependent on social housing, but your social housing is too far from your work, you will probably end up on benefits. Or you will spend so much of your time and money travelling to and from work, so as to destroy your quality of life.

Berkhamsted is a beautiful town, ideal commuting distance from London. But it has the challenge of its location.

It is set in a relatively steep valley which rises over 60m from the bottom of the valley to the top. The main road up the valley, forms the high street through the town. The Railway station is near the centre of the town. There are not many alternative roads to the high street, to get from one end of the town to the other. There are few radial roads. So for most journeys from the periphery of the town, to any other part of town it is necessary to go through the centre. The result is the main junction in the town is regularly grid locked in rush hour.

The centre of the town was built in the 19th century. With narrow streets and no off-street parking. In the 20th Century the town continued to expand until the periphery is no longer in walking distance of the centre.

There are no natural routes for new roads to relieve this. The existing roads are not capable of handling the existing traffic.

There are proposals to build 2,200 new houses on the edge of town. Most of these will be large family houses which will not be affordable on local wages.

No explanation has been provided as to how the town's road and transport system will be able to cope with the resultant journeys that will be generated which will result in a further 13,200 car journeys a day according to 'Trics' (Trip Rate Information Computer System).

Included files

Title Question: Evidence Base

ID EGS12698

Person ID 1269597

Full Name Ms STEPHANIE HOWE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTION: Evidence Base comment The ONS have now reduced their estimate for the housing requirement in the borough and therefore a far lower level should be planned for. If you go ahead with this density of housing living here will be so unpleasant. The area already seem overcrowded with the steady infilling, which has been going on for a number of years, with the enormous increase that you propose it will make life unbearable.

Included files

Title Question: Evidence Base

ID EGS12715

Person ID 1269600

Full Name Alex Marsh

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <ul style="list-style-type: none"> • There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape. • The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the • There is no agriculture strategy
Included files	
Title	Question: Evidence Base
ID	EGS12727
Person ID	1269605
Full Name	Ms Hailey Woldt
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	The evidence base for housing need is 2014 ONS data not the more recent 2018 data. So, the local Plan is not based on accurate and up-to-date information.

Included files	
Title	Question: Evidence Base
ID	EGS12738
Person ID	1145958
Full Name	Mr Adrian England
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>It is not up to date.</p> <p>As well as the recent change in the housing target figure which is produced by the standard method, which in fact changed mid consultation, there are significant impacts to be considered from the proposed white paper changes. Particularly significant are the plans to categorise land as 'protect' and 'growth' and 'renewal' areas. Under the current proposals from the Local Plan, 750 hectares of additional greenbelt are planned to be released, and it would appear that these areas would then automatically become 'growth' areas. This would result in a significant loss of planning influence by the council and local residents, which has a myriad of potential pitfalls for our community.</p> <p>Many of the documents in the evidence base are understandably not up to date with these changes, and whilst this is not required for every piece of evidence, these potential changes are enormously significant and must be given due consideration in relation to the local plan, which to date, is not the case.</p> <p>WHERE are the Topic Papers on Heritage and on Health, Wellbeing and Cohesion? These are two of the "Objectives" and all the others are covered – why not these?</p> <p>Certain important documents such as the Dacorum Infrastructure Plan remain in draft form, and it is difficult for residents to make an informed judgment on the Local Plan as a whole when key documents such as this are not final. With a proposed 25% increase in population, infrastructure is one of the main areas of concern for residents, but with this area barely touched on in the main plan, and the Dacorum Infrastructure Plan still subject to unspecified changes, it is not possible for residents and businesses in Dacorum to form a well advised opinion on these matters.</p>
Included files	
Title	Question: Evidence Base

ID	EGS12746
Person ID	1250257
Full Name	Kate Harwood
Organisation Details	The Gardens Trust
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	DBC has sufficient information in the HE <i>Register</i> and the <i>Local List of Parks and Gardens</i> to conserve and enhance these irreplaceable designed landscape heritage assets as required by NPPF. The Local Plan now needs some policies to ensure that, both in the development of the Plan and subsequent use, these heritage assets are considered along with other constraints when considering development.
Included files	
Title	Question: Evidence Base
ID	EGS12753
Person ID	1250256
Full Name	Herts Gardens Trust
Organisation Details	Herts Gardens Trust
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	DBC has sufficient information in the HE <i>Register</i> and the <i>Local List of Parks and Gardens</i> to conserve and enhance these irreplaceable designed landscape heritage assets as required by NPPF. The Local Plan now needs some policies to ensure that, both in the development of the Plan and subsequent use, these heritage assets are considered along with other constraints when considering development.

Included files	
Title	Question: Evidence Base
ID	EGS12770
Person ID	1269624
Full Name	David Burne
Organisation Details	Redington Capital
Agent ID	1269623
Agent Full Name	Mark Harris
Agent Organisation	Associate Bidwells LLP
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The Employment Topic Paper (paragraph 3.25) is clear that across South West Hertfordshire ‘<i>land supply for offices exceeds the recommended 2018-2036 floorspace growth by 76,000 sq m</i>’. It is noted that the surplus land supply can largely be attributed to oversupply of office floorspace in Watford and Three Rivers (paragraph 3.26), but the conclusion that this oversupply could address the undersupply elsewhere appears to have been downplayed, with the suggestion at 3.27 that the supply would only meet ‘<i>footloose</i>’ demand.</p> <p>My clients do not agree with this conclusion, particularly as the Employment Topic Paper goes on to confirm (section 4) that Dacorum sits in a Functional Economic Market Area (FEMA) with Watford, Three Rivers and other authorities. It is therefore not unreasonable to assume that the availability of office floorspace should be looked at across the wider area, rather than strictly on an authority basis, which is the proposed approach in the draft Local Plan. As covered below, such an approach is not in line with national policy which expects economic issues to be looked at across functional areas, not authority by authority.</p> <p>The Employment Topic Paper goes on to recognise a number of points which align with our position that the approach to restricting the loss of office floorspace is inappropriate. In particular, the input of the Councils’ own Economic Development and Infrastructure Team (paragraph 4.26) which confirms (amongst other points) that:</p> <ul style="list-style-type: none"> • Demand for large office buildings/space is falling as the nature of business changes • There is a major shortage of smaller units to facilitate business growth • A criteria based policy could be considered to protect better quality units
Included files	

Title	Question: Evidence Base
ID	EGS12785
Person ID	1269628
Full Name	Steven Bragg
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS12793
Person ID	1269630
Full Name	Christopher Lyne
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Absolutely not. As you will know well, some of the required documents were not finished at the time the Plan was put out to consultation. The Evidence Base is not complete.
Included files	
Title	Question: Evidence Base
ID	EGS12822
Person ID	1269634
Full Name	Frank Worth
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>—Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>— There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>— The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>— There is no agriculture strategy</p>

Included files	
Title	Question: Evidence Base
ID	EGS12836
Person ID	1269646
Full Name	Colin McHugh
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	(no comment)
Included files	
Title	Question: Evidence Base
ID	EGS12849
Person ID	1145801
Full Name	Mr Guy Barlow
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I have been informed from a number of sources that the Evidence Base is neither up to date or accurate.

The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.

The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.

The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.

Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date 2018 data.

Included files

Title Question: Evidence Base

ID EGS12900

Person ID 1269665

Full Name Mr Martin Hicks

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment Some opf it relies on old reports which should have been reviwed (2004, 2006 and 2011).

Included files

Title Question: Evidence Base

ID EGS12915

Person ID 1207443

Full Name Mrs Jennifer Bissmire

Organisation Details	Clerk Markyate Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	No. This is why Markyate Parish Council joined the representation from the Town & Parish Councils to Cllr Williams, leader of Dacorum Borough Council which concluded 'The Plan does not meet the needs of our communities and its ambitions will undermine the quality of life of our residents whether they live in towns, villages or rural areas. We ask that the Borough Council withdraws this Plan as it needs to be fundamentally re-shaped to reflect the Vision of the community to retain the Green Belt and the Boroughs objectively assessed housing needs.'
Included files	
Title	Question: Evidence Base
ID	EGS12919
Person ID	1269666
Full Name	Mr Andrew Oliver
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The local plan is based on data from the ONS from 2014, not the most recent data from 2018. The number of additional homes is therefore greatly inflated. The local plan was prepared in the pre-Covid era. There have been huge changes in working practices and community behaviour which the plan needs to be changed to address.

Included files	
Title	Question: Evidence Base
ID	EGS12931
Person ID	1269677
Full Name	CAROLINE CLIST
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>Whilst documents have been recently updated, the current pandemic will accelerate trends and change the way that land is used.</p> <p>From reduced office space due to increased home working and the changing way that houses are used, to the prevalence of home delivery impacting employment and road usage, things will change and quickly (once the pandemic is over) in a way that was not foreseen a year ago. This plan could be at the forefront of a new way of sustainable living.</p>
Included files	
Title	Question: Evidence Base
ID	EGS12944
Person ID	1269678
Full Name	GARY TRENT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	No

* No	
QUESTION: Evidence Base comment	The modelling of housing need is flawed.
Included files	
Title	Question: Evidence Base
ID	EGS12956
Person ID	1269679
Full Name	GARY CALLUM
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS12978
Person ID	1264971
Full Name	Louise Watson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Evidence Base comment	<p>Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as 'protect', 'growth' and 'renewal' areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt – it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.</p> <p>The Glover report has been ignored – this has recommended that the Chilterns AONB becomes a national park – we do not want a sprawl of executive housing estates encroaching on the AONB.</p> <p>There is no agricultural strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS12988
Person ID	1269776
Full Name	STEPHEN MACKENZIE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>Inadequate or out of date evidence is presented to justify the impact to greenbelt land proposed for development along with the SSSI and AONB that surround the borders of Tring</p> <p>The NPPF makes clear that where greenbelt land is released for development, appropriate compensatory improvements must be made to the environmental quality and accessibility of remaining greenbelt land. There is no clarity in the plan as to how this would be achieved.</p>
Included files	
Title	Question: Evidence Base

ID	EGS13001
Person ID	1059698
Full Name	Mr Richard Lyne
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	Absolutely not. As you will know well, some of the required documents were not finished at the time the Plan was put out to consultation. The Evidence Base is not complete.
Included files	
Title	Question: Evidence Base
ID	EGS13010
Person ID	330928
Full Name	Mr James Gregory
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	This scheme poorly structured using out of date information. The current ONS household projections already supersede the numbers used in the proposal. It does not incorporate current thinking on environmental sustainability, real estate price projections, green energy or future employment arrangements such as working locally and away from city centres
Included files	

Title	Question: Evidence Base
ID	EGS13022
Person ID	1164731
Full Name	Deborah Turnbull
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13037
Person ID	1270011
Full Name	Mrs Nicola Davis
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I have heard that the evidence base is not up to date or accurate.</p> <p>The ONS has provided household projections in 2018 - but this local plan is based on out of date ONS projections from 2014.</p> <p>I believe that there would be a need for far lower scale of development if the accurate / latest figures were applied along with applying the revised Government guidance on calculating housing needs. I understand the projected need would fall by maybe 50%?</p>
Included files	
Title	Question: Evidence Base
ID	EGS13060
Person ID	1270013
Full Name	Mr Daniel Ritchie
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:</p> <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan

- Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers

Included files

Title Question: Evidence Base

ID EGS13075

Person ID 1270019

Full Name Ms Clare Kirwan

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment Not enough detail or consideration given for each site

Included files

Title Question: Evidence Base

ID EGS13103

Person ID 1270037

Full Name MRS GINA BARLOW

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment	<p>I have been informed from a number of sources that the Evidence Base is neither up to date or accurate.</p> <p>The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.</p> <p>The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.</p> <p>The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.</p> <p>Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date 2018 data.</p> <p>I also believe the evidence to support the release of green belt is missing, as is a sound transport infrastructure plan, evidence to show mitigations have been put in place to support good air quality which is not detrimental to residents.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13122
Person ID	1264860
Full Name	Alan Coughtrey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>We have been informed from a number of sources that the Evidence Base is neither up to date or accurate.</p> <p>The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.</p> <p>The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.</p>

The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.

Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date 2018 data.

Included files

Title Question: Evidence Base

ID EGS13138

Person ID 1270061

Full Name Mrs Coughtrey

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment

We have been informed from a number of sources that the Evidence Base is neither up to date or accurate.

The ONS (Office for National Statistics) has provided household projections most recently in 2018. But this local plan strategy is based on older out of date ONS projections from 2014.

The changes in the projections between these reports are very important, I believe if the correct and most current 2018 figures were used along with applying the revised Government guidance on calculating housing needs - this would result in a plan for a much lower scale of development.

The Council has based its calculations on the outdated 2014 based ONS data which, results in a significant overestimate of housing and brings into question the soundness of any local plan based on them.

Studies by our local town councillors have indicated that the projected 1000+ houses required per annum under the 2014 ONS data would likely reduce to less than 500 per annum using the most up to date 2018 data.

Included files

Title Question: Evidence Base

ID EGS13152

Person ID 1270066

Full Name	Dr Amanda Cole
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13172
Person ID	1270069
Full Name	Patrick Moloney
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	No

* No	
QUESTION: Evidence Base comment	<ul style="list-style-type: none"> • Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely. • There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape. • The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB. • There is no agriculture strategy
Included files	
Title	Question: Evidence Base
ID	EGS13186
Person ID	1144725
Full Name	Mr Philip Anderson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<ul style="list-style-type: none"> • Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for

retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.

- There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.
- The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.
- There is no agriculture strategy

Included files

Title Question: Evidence Base

ID EGS13203

Person ID 1270127

Full Name Amy Moloney

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

- Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.
- There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as ‘protect’, ‘growth’ and ‘renewal’ The plan to release significant Green Belt land into the hands

of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape.

- The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB.
- There is no agriculture strategy

Included files	
Title	Question: Evidence Base
ID	EGS13222
Person ID	1270128
Full Name	Richard Salway
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:</p> <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan • Final version of Strategic Design Guide SPD - as this specifies details and the criteria for the Sustainability Statements to guide developers
Included files	
Title	Question: Evidence Base
ID	EGS13236
Person ID	1258764
Full Name	Mark Bullard

Organisation Details	Tring Squash Club
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS13243
Person ID	1270143
Full Name	Mr Thomas Parsons
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit will no doubt continue to decrease this projection.
Included files	
Title	Question: Evidence Base
ID	EGS13263
Person ID	1270148

Full Name	Mr Carl Blackwell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13287
Person ID	1270157
Full Name	Ms Claire Laing
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	

* No	
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies</p> <p>substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13291
Person ID	1270175
Full Name	Mr Chris Bugden
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	(no comment)
Included files	
Title	Question: Evidence Base

ID	EGS13317
Person ID	1270198
Full Name	Mr Hilary Curtis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS13345
Person ID	1270207
Full Name	Ms Helena Thorpe Foulsham
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	Further investigation needed to respond to this question. This was only brought to our attention on Saturday 27th February - as no previous communciation had been received.
Included files	
Title	Question: Evidence Base
ID	EGS13356

Person ID	490211
Full Name	Ms Barbara Saville
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<ul style="list-style-type: none"> • Due to Covid-19, we are living through a period of rapid evolution with the full impact yet to be assessed. It is almost impossible for the full impact to be assessed as yet, but there are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely. • There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as 'protect', 'growth' and 'renewal' areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt — it would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape. • The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB. <p>There is no agriculture strategy</p>
Included files	
Title	Question: Evidence Base
ID	EGS13382
Person ID	1270224
Full Name	Ms Heather Wignall
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council 's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their _allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13408
Person ID	1270229
Full Name	Homes England
Organisation Details	
Agent ID	1270231
Agent Full Name	Ms Rebecca Dewey
Agent Organisation	Associate Director WSP
Yes / No	
* Yes	
* No	

QUESTION: Evidence Base comment

No. As per our response at Question 2, the Evidence Base is primarily outdated and unreliable based upon its reliance on outdated housing numbers, as well as its incorrect interpretation of the NATS consultation zones, and the inclusion of HMP The Mount’s drainage infrastructure and infiltration basin within Growth Area Bv02.

The Development Strategy Background Topic Paper (November 2020) is incorrect in its reference to a major constraint of the possible redevelopment at Bovingdon Airfield as the requirement to overcome the *“height restriction associated with the air traffic control (NATS) navigation beacon at Bovingdon Airfield”*. As detailed within our response to Question 5, this is an incorrect interpretation of the data and should be reconsidered in the context of our correspondence and consultation with NATS.

Appendix A of the Urban Capacity Study (incl. Windfall Assessment) (November 2020) is outdated, incorrectly highlighting a larger development area than proposed (**Appendix C**), including the drainage soakaways and infiltration basin associated with HMP The Mount. In addition, it seeks to lower the expected housing delivery to 40 dwellings without technical evidence and contrary to the opinion of the landowner.

Table 75: Bovingdon summary of key infrastructure requirements, of the Draft Dacorum Infrastructure Delivery Plan (November 2020) and the ‘Draft Infrastructure Delivery Plan – November 2020 – Settlement Schedule for Bovingdon, note *“Ensure the drainage infrastructure associated with HMP The Mount and the adjacent holding reservoir for Bovingdon are maintained and where necessary, enhanced (Bv02)”*. It also makes references to the provision of a site of 40 dwellings.

The AECOM site assessments were also each considered against a lower housing need for the Borough, allowing for the discounting of sites which could support the sustainable development of the Council. Further, the Urban Capacity Study (November 2020) estimated capacity within the existing settlements at 10,440 homes, below the level of housing required. The Site Selection Topic Paper (November 2020), interrogates the level of urban capacity available, including existing allocations, commitments, and windfall allowances. Concluding that 10,954 dwellings can be expected to be delivered within the urban areas (note this is slightly different from the number set out within the Urban Capacity Study). This is 7,460 dwellings short of the housing requirement of 18,414 dwellings (based on 1,023dpa).

The issues outlined above with the supporting Evidence Base, in addition to our response to question 2-7, show that in addition to the interpretation of NATS consultation zones, the change in housing requirement has resulted in the need for extensive updates to the Evidence Base and Draft Plan.

Included files

Title Question: Evidence Base

ID EGS13427

Person ID 1270261

Full Name MRS SAFFRON MURRAY

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit will no doubt continue to decrease this projection.
Included files	
Title	Question: Evidence Base
ID	EGS13445
Person ID	1270264
Full Name	MRS JANE BROWN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	There is no clearly evidenced information on a local housing need. However, emerging needs should be met by the development of local brownfield sites. There is no evidence of the exceptional circumstances needed to justify the use of any of the local Green Belt for housing development.
Included files	
Title	Question: Evidence Base
ID	EGS13448

Person ID	1270264
Full Name	MRS JANE BROWN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	No up-to-date evidence of 'exceptional circumstances' justifying development of Green Belt in east Tring.
Included files	
Title	Question: Evidence Base
ID	EGS13452
Person ID	1270263
Full Name	MRS SHARON O'SULLIVAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The evidence base is inadequate because a full consideration of all possible sites has not been carried out. Relying only on proposals put forward by developers may well be justified when the housing need can be accommodated relatively easily, but not when a substantial increase is required in a local authority area with not only a substantial percentage of Green Belt land but also an AONB. The council's own search showed potential for this approach but it was not given sufficient attention in the plan.
Included files	
Title	Question: Evidence Base

ID	EGS13461
Person ID	1264853
Full Name	Nick Davis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	It has been documented that calculations have been based on ONS data, and therefore projections are not accurate. 2018 data suggests fewer dwellings required.
Included files	
Title	Question: Evidence Base
ID	EGS13475
Person ID	1270266
Full Name	VANDA EMERY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	No, A lot of it is irrelevant, much is flawed, and most importantly, it's needlessly large and some poorly structure that it's opacque. This is mostly documented above but the highlights are: 1) Sustainbilty apprcial based on "low carbon" not "zero carbon" 2) I've included a list of evidence above about the flaws in the key premise underpinning the whole Local Plan, i.e. the goverment house building targets.

3) As the objective of the Local Plan are incorrect there for key peice of evidence like the transport study are invalid as they assess the wrong things. For instance. The Transport study only assess whether transport can be made "more sustainble" when it should be assessing whether it can be made "zero carbon combatible" inline with the goverments national zero carbon target and road to zero strategy. The UK climate target is legally binding not asperational bonus! It's list of interventions are there for completely inadquate.

4) Carbon Budgeting doesn't include construction emissions within the year the construction occurs which is an oversite. This means borough will be emitting significantly more GHG's that it's budget allows during years when there is significant construction, but will think it's happily within budget. Such false positives are dangrously misleading, as they could mean the UK or the World is missing it's targets, but all the country/borough think they are doing enough.

5) 'South West Herts Economic Study' - Doesn't take account of Pandemic and Climate Emergancy, both of which may lead to less/shorter commuting, more working from home, and less big offices.

6) Flooding isn't part of climate change mitigation or sustainability, it is a seperate enviromental concern. It therefor is misleading to list flooding assessments under heading of "climate change and Sustainbilty" as it gives the impress the local plan as lots of "climate change and Sustainbilty" evidence when in fact it has very little.

The biggest problem with evidence base is the size of it. For there to be any accountability or transparency yet the council needs to publish everything (including minutes from all meeting that shape these proposed which are currently absent), but the council also needs to to make grant funding available to scrutinist all this infomation. It cannot publish multiple books worth of infomation adn expect the populations over the course of a few mounths to read and anaylsis all of it. People independant of the council need to be paid to scrutinise all the infomation and pull out the key infomation and issue in formats the public can engage with. I suggest that the Political foundation model where council makes grants available to political parties to commission external organisaition to do detailed scrutiny work based on the number of votes each party received in last election.

Included files	
Title	Question: Evidence Base
ID	EGS13502
Person ID	1270278
Full Name	CHRISTOPHER COOK
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	

QUESTION: Evidence Base comment	Not enough detail or consideration given for each site
Included files	
Title	Question: Evidence Base
ID	EGS13516
Person ID	1270285
Full Name	MARTIN WELLER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13527
Person ID	1270291
Full Name	Mr Mark Smith
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	It sounds like the whole plan is based on out-dated and flawed evidence and planning, so will be perceived negatively by the public – probably seen as motivated by greed rather than genuine need.
Included files	
Title	Question: Evidence Base
ID	EGS13556
Person ID	1260521
Full Name	Steve Ritchie
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published: <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan • Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers
Included files	
Title	Question: Evidence Base
ID	EGS13563

Person ID	1207724
Full Name	Mrs Gill Broadbent
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The evidence base accepts the government target of 922 homes/year, however it would be useful if the document included its own estimate of the number of homes required as a result of the evidence base activities. The document uses the answer forced upon the area as its result of the evidence base, which is about face!</p> <p>There should definitely be a summary of the evidence base included in the documentation for context.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13574
Person ID	1227768
Full Name	Ms Denise Young
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit will no doubt continue to decrease this projection.</p>

Included files	
Title	Question: Evidence Base
ID	EGS13594
Person ID	1270310
Full Name	Ms Eleanor Jelf
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The consultation period should be extended to allow missing and draft documentation to be published.
Included files	
Title	Question: Evidence Base
ID	EGS13604
Person ID	1270314
Full Name	Ms Claire Mistry
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	The current Local Plan relies on outdated data, from a study in 2011 – which showed potential problems with water supply / drainage. The revised Local Plan must make it clear what impact the development proposals will have on this, as well as sewage – especially if after review there is still a greater number of housing suggested.

The level of new housing currently proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer which in turn would cause further damage to the Borough's precious chalk streams. New supplies of water are not likely to be possible until after 2030.

The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.

Included files

Title Question: Evidence Base

ID EGS13630

Person ID 1145871

Full Name Mr Gareth Morris

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files	
Title	Question: Evidence Base
ID	EGS13643
Person ID	1270343
Full Name	KEITH DELDERFIELD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13663
Person ID	1153415
Full Name	Graham Paterson
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I commend the level of effort and sense of public service which Dacorum BC employees have contributed and demonstrated in creating this strategic plan, however I regret to have to state that I consider its conclusions to be fatally flawed. Since my principal comment relates only to Question 7 of your consultation comments form, I have simply included my answer to that question below in this email, rather than enclose a fully completed form. My views on all the other questions in the comments form are very articulately covered by the official responses to the strategic plan submitted to you by Berkhamsted Town Council, Berkhamsted Citizens' Association and Berkhamsted Residents Action Group.</p> <p>My concern is the premise under which this Dacorum strategic plan has been developed – viz. that the plan cater for what the authority defines as the level of “need” for more housing. The authority’s evidence for this definition of need comprises data from various sources including HM Government and the SW Herts Strategic Housing Management Assessment of 2016.</p> <p>I agree completely with the detailed comments in answer to this question made in the official responses to the Dacorum strategic plan by Berkhamsted Town Council, Berkhamsted Citizens' Association and Berkhamsted Residents Action Group, and I would add my own comments as follows:</p> <ol style="list-style-type: none"> 1 During the Covid-19 pandemic, there has been clear proof that a significant portion of the previously office based working population are able to work productively from home – and this despite the UK’s ultra-high speed broadband infrastructure’s currently being somewhere between ‘almost non-existent’ and ‘utterly pathetic’. 2 I am certain that many large-scale employers in the UK will be revising their medium and long term needs for increased office space in the area of London and the Home Counties, having taken into account the demonstrated success of 'remote working' during the pandemic. Prior to the pandemic, I myself had direct experience of the benefits, for both employees and company, which result from this approach, having been an executive board member of a US company which implemented such a plan for a significant portion of its own staff nearly twenty years ago. 3 Microsoft have recently announced that they will make ‘remote working’ a permanent option for their staff and other high-tech companies are already following suit. It will not be long before even the most conservative employers (even eventually Goldman Sachs) will find it desirable to review their own medium and long term plans on this matter. There is no question in my mind that a sufficient number of companies will pursue this course of action within a sufficiently short timescale that it would alter the housing needs currently assumed by the Dacorum plan. Moreover, were HM Government to invest sensible sums in the provision of ultra-high speed broadband to homes

throughout the country, then the currently perceived growth in demand for housing in the South East of England could be lowered on a still earlier timescale.

- 4 HM Government should therefore be advised by all local authorities, especially those in South East England, that they must invest far more than the relatively trivial sum of £5bn (see House of Commons briefing paper CBP 8392, dated 2nd December, 2020) in bringing forward the provision on gigabit broadband to home owners across the whole country. As an aside, note for comparison that HS2 (a project which would have had great relevance, if only it had been effected in the 1960's or 1970's) is currently on track to exceed £100bn. A cost/benefit study would I believe show that ultra-high speed broadband has a hugely greater pay-off than HS2 and that the delivery of ultra-high speed broadband can be effected far more rapidly.
- 5 Such a national study of the impact of ultra-high speed broadband on 'remote working' and consequential impact on housing needs to be undertaken urgently. This ideally would be completed before further consideration of the current Dacorum strategic plan, such that the key input factor of housing need can be revised based on a properly thought-through assessment of the impact on such need of the likely future work environment, as opposed to the work environment of yesteryear.

Included files

Title Question: Evidence Base

ID EGS13699

Person ID 1270359

Full Name Mr John Dowling

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment Following comment on Q6 - there is very little evidence of "what might be lost" on various proposed sites - particularly with respect to the Natural History - we cannot go on assuming that the nature will just "move somewhere else" when a development proceeds - it will not, it will simply be lost.

Included files

Title Question: Evidence Base

ID EGS13704

Person ID	1270361
Full Name	Mr Jon Whysall
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS13718
Person ID	1263002
Full Name	Rhona Denness
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>Whereas the Local Plan gives special attention to the Ashridge portion of the Beechwood SAC, little specific attention is paid to the other SSSI's which border Tring (and another which is just outside in Buckinghamshire). No consideration is given to the adjoining woodland in Buckinghamshire. The impact of proposed developments on these areas are not reflected in the Local Plan.</p> <p>If it is concluded that Green Belt land should be released for housing, the NPPF makes it clear that improvements must be made to environmental quality and accessibility of remaining Green Belt land. There is no detail/commitment to how this would be achieved within the Local Plan.</p>

Included files	
Title	Question: Evidence Base
ID	EGS13732
Person ID	223941
Full Name	Mrs Cathy Davidson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13749
Person ID	1270368
Full Name	Mr Charlie Laing
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13779
Person ID	1270380
Full Name	Mrs Samantha Weston
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	It is based on old data which is known to be not representative of the current situation.

Included files	
Title	Question: Evidence Base
ID	EGS13791
Person ID	
Full Name	
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon outdated ONS projections.</p> <p>The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit will no doubt continue to decrease this projection.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13808
Person ID	1163978
Full Name	John Wignall
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	<p>I consider the council ' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council ' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their all_ocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13820
Person ID	1270385
Full Name	Ms Katy Regan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>Whilst it is clear that an enormous amount of work has been carried out in relation to the local plan, there are multiple recent factors which have not been taken into account.</p> <p>The vast majority of the Local Plan was prepared prior to the offset of COVID, and so doesn't account for major changes in working and shopping practices which are expected, or the requirement for public open space which has become more pronounced.</p>

A large proportion of the evidence base doesn't account for the recent update in Climate Change science, which insists upon an accelerated pathway to net zero.

As well as the recent change in the housing target figure which is produced by the standard method, which in fact changed mid consultation, there are significant impacts to be considered from the proposed white paper changes. Particularly significant are the plans to categorise land as 'protect' and 'growth' and 'renewal' areas. Under the current proposals from the Local Plan, 750 hectares of additional greenbelt are planned to be released, and it would appear that these areas would then automatically become 'growth' areas. This would result in a significant loss of planning influence by the council and local residents, which has a myriad of potential pitfalls for our community.

Many of the documents in the evidence base are understandably not up to date with these changes, and whilst this is not required for every piece of evidence, these potential changes are enormously significant and must be given due consideration in relation to the local plan, which to date, is not the case.

Certain important documents such as the Dacorum Infrastructure Plan remain in draft form, and it is difficult for residents to make an informed judgment on the Local Plan as a whole when key documents such as this are not final. With a proposed increase in population of a quarter, infrastructure is one of the main areas of concern for residents, but with this area barely touched on in the main plan, and as the Dacorum Infrastructure Plan still subject to unspecified changes, it is not possible for residents and businesses in Dacorum to form a well advised opinion on these matters.

There is no mention of the Glover Report, which proposed the AoNB become a National Park.

No strategies for or mention of agriculture even though 85% of borough is rural.

The Habitats assessment is out of date (2006).

No Habitats Regulations Assessment (HRA) documents are published alongside the draft Local Plan for consultation.

Included files

Title Question: Evidence Base

ID EGS13826

Person ID 1207914

Full Name Maria Oliver

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment	The evidence base is data from the Office for National Statistics from 2014, rather than the more recent data in 2018
Included files	
Title	Question: Evidence Base
ID	EGS13836
Person ID	777073
Full Name	Mrs Anne Lyne
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>The actual need according to ONS is shown at 355 per annum, not 1,023, nor even the previous 922. Development to this level simply is not sustainable in the Borough for many reasons and will be developer-driven, still failing to provide the much-needed housing at an accessible price for local people.</p> <p>This Plan is not about how to improve Hemel Hempstead for Hemel people but merely to hit an artificial inflated housing figure. The Census due on 21 March will produce much more accurate figures. There is room within the NPPF for Councils to set their own targets provided they can justify their numbers.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13841
Person ID	777073
Full Name	Mrs Anne Lyne
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	No as some of the required documents were not finished at the time the Plan was put out to consultation, so some evidence is missing.
Included files	
Title	Question: Evidence Base
ID	EGS13856
Person ID	1270387
Full Name	Mr Richard Pilkinton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>The latest housing needs information is not used. If it were it is unlikely that any building would be required on Green Belt land.</p> <p>The housing needs are not calculated using the 2018 ONS data and do not take adequate account of Green Belt and AONB constraints. Since the publication of the Plan, the Government has revised it's method of housing needs calculation but still not to use the latest ONS data.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13871
Person ID	611689

Full Name	Mrs Sheila Pilkinton
Organisation Details	Markyate Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>The latest housing needs information is not used. If it were it is unlikely that any building would be required on Green Belt land.</p> <p>The housing needs are not calculated using the 2018 ONS data and do not take adequate account of Green Belt and AONB constraints. Since the publication of the Plan, the Government has revised it's method of housing needs calculation but still not to use the latest ONS data.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13881
Person ID	1270388
Full Name	Mr & Mrs David & Emma Robertson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and

contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS13906

Person ID 1264756

Full Name Kathryn Salway

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* **Yes**

* **No**

QUESTION: Evidence Base comment

The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:

- Climate Change and Sustainability SPD
- Detailed Design Guide SPD
- Climate Change Strategy and Action Plan

- Final version of Strategic Design Guide SPD - as this specifies details and the criteria for the Sustainability Statements to guide developers

Included files

Title Question: Evidence Base

ID EGS13918

Person ID 1207810

Full Name Louisa Groves

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment The evidence is all weighted on transport and housing infrastructure with little or no evidence of the effect on local habitats and the environment.

Included files

Title Question: Evidence Base

ID EGS13928

Person ID 1270392

Full Name Ms Anna Skingley

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The councils assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS13978
Person ID	1270411
Full Name	Ms Jacqui Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	(no comment)
Included files	
Title	Question: Evidence Base
ID	EGS14005
Person ID	1270423
Full Name	BERNAREGGI GRAZIA

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	Housing targets: The whole plan is based on out of date housing projections from 2014 which are double the latest projections from 2018. This mean that the whole plan is flawed and does not justify any use of green belt land.
Included files	
Title	Question: Evidence Base
ID	EGS14023
Person ID	1270425
Full Name	EMMA LELIEVELD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>DBC's (disputed) interpretation of the national requirement without challenge or resistance has overridden the needs of the local community and is at odds with the sustainability goals of the local area. The local plan must be redesigned to prioritise the needs of the local community and its sustainability. Government policy gives DBC flexibility to do this yet DBC seems to have willfully fettered its discretion. This needs explaining to the local community before proceeding to the pre-submission stage.</p> <p>As noted in response to Question 5, there is additional evidence that should be gathered and considered prior to the pre-submission stage, in particular the impact of sites along the ridge area of Berkhamsted which are in the current plan.</p>

Included files	
Title	Question: Evidence Base
ID	EGS14035
Person ID	1270428
Full Name	KIERAN HOLLAND
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon outdated ONS projections.</p> <p>The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit and Covid will no doubt continue to decrease this projection.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14040
Person ID	1270471
Full Name	PHILIP HICKS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS14059
Person ID	1264962
Full Name	Courtney Culverhouse
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I agree with Dacorum Green Party that the consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:</p> <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan • Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide <p>A much simpler public consultation should be implemented. Numerous members of the public haven't responded due to the complexion of the consultation - and I nearly fell into this category!</p> <p>At the time of submission the Central Government development figures for Dacorum are being reviewed and the consultation should be extended until these are published</p>
Included files	
Title	Question: Evidence Base
ID	EGS14068

Person ID	1270476
Full Name	ALISON CHESHIRE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>No!</p> <p>As an HR Manager, I'm seeing first hand how the impact of Covid-19 is bringing about change in the way we live and work. There are indications that there will be less demand for retail and office space in town centres, freeing up much brownfield land for development. Many families may choose to move further from the South East as they can now work remotely.</p> <p>There has been a change to the way the housing target figure was produced mid-consultation. This includes plans to categorise land as 'protect', 'growth' and 'renewal' areas. The plan to release significant Green Belt land into the hands of developers would risk these highly valued areas becoming growth areas. This is a serious risk to the Green Belt. It would result in a significant loss of planning control to local authorities and local residents and permanently blight our valued landscape. The Glover report has been ignored — this has recommended that the Chilterns AONB becomes a national park — we do not want a sprawl of executive housing estates encroaching on the AONB. There is no agriculture strategy.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14117
Person ID	1270501
Full Name	DAVID WHITE
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>Dacorum's target of 922 dwellings is based on out-of-date projections carried out in 2014. Subsequent household projections in 2016 and 2018, by the Office for National Statistics (ONS), have been much lower, with significant declines in London, the South East, and the East of England. For example, in 2014 the ONS projected growth, over 25 years, at 23.1%. In 2016 this projection fell to 17.3%, and in 2018 it fell to 16.2%. Within these projections, increases in the East Midlands, North East, North West, and South West were balanced by significant declines in London, the South East, and the East of England.</p> <p>In Dacorum, the reduced projections led to a fall in the annual requirement for dwellings from 922 in 2014 to 430 in 2018. The trend for working from home rather than commuting to an office, has further reduced the demand for dwellings near train stations within commuting range of London. Future projections for housing requirements in Dacorum are likely to be even lower. So, Dacorum's Local Plan is based on projections that are out of date and that do not reflect current demand.</p> <p>Other planning authorities have declined to use these outdated projections. For example, in October 2020, Buckinghamshire Councillors voted to withdraw their Local Plan and are working on a revised plan to "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law". Dacorum's councillors should follow the example of their Buckinghamshire counterparts, withdraw their Local Plan, and produce a new plan based on current projections.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14137
Person ID	1263506
Full Name	Ian Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflected in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14158
Person ID	1163439
Full Name	Lindy Weinreb
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>A Housing numbers</p> <p>I note the discussion provided in Topic Paper 'Development Strategy November 2020': this tracks the history, marshals the data and argues that the dwelling numbers for the Reg18 Plan meets the housing needs for the Borough viz 922 [or recently 1023] pa. I dispute this is the correct basis for the Plan – which is based on 'national requirements' rather than local needs.</p> <p>The paper includes a comment:</p>

Below I set out data drawn from reliable sources e.g. ONS and the study commissioned by the Districts' Joint Housing Needs Assessment quoted in the Plan.

The current dwelling numbers established in the Adopted 2013 Core Strategy sets an annual build rate of 430 pa.

- The Data shown in Fig 2 Housing Trajectory 2020 – 2038 [p 38] records anticipated completions across the Borough for 2020/21 as **654** and 21/22 as **1036** . These are well in excess of the Core Strategy and also the numbers projected by ONS.

The numbers set for the Draft Plan have been based on the ONS projections of housing 'need' but manipulated by a formula adopted by MHCLG to determine the 'national requirements' stated in Para 6.7 above.

Dacorum

ONS projection of Dacorum annual housing growth

After adjustment by MHCLG algorithm

After adjustment by MHCLG algorithm

ONS 2014

730

1023 [new standard applied]

ONS 2018

355

922 [mutant applied]

497 [new standard applied]

As a result, I object to the adoption by the Borough of the Ministry's numbers: a lesser number to meet the assessed local needs must be agreed upon. This must lead to a revision of the site allocations and a new Plan.

I note the data in Table 6 Affordable Housing Need across South West Hertfordshire [page 62] indicates an assessed need of 611 dwellings pa.

Affordable Housing Need [per annum]

DACORUM

Rented affordable housing

363

Affordable Home Ownership

248

TOTAL

611

I also note that the Borough assumes a continuing policy of requiring 40% of new dwellings should be allocated as 'affordable' on Growth Areas [viz Green Belt], with 35% in the urban area of Hemel Hempstead and 40% elsewhere [DM 1 para a.]

For an area with acute need for homes at 'social rents' [see Para 14.29 et seq p 62] should the proportion not be increased to 50 or 60%?

This would change the market dynamics and deliver a better share to the community of the uplift to land value following the release of (mainly) Green Belt land and consent to development.

Included files

Title

Question: Evidence Base

ID

EGS14176

Person ID

1270552

Full Name

Mr Michael Friend

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

No

* Yes

* No

QUESTION: Evidence Base comment

(no comment)

Included files	
Title	Question: Evidence Base
ID	EGS14195
Person ID	1253654
Full Name	Jodie Bell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council™s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council™s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p> <p>Considering that the housing data is from 2004 and that we have had a global pandemic since this plan was written which has changed so many factors, I do not agree that the evidence base that accompanies the plan is adequate, relevant and up-to-date at all.</p> <p>The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:</p>

- Climate Change and Sustainability SPD,
- Detailed Design Guide SPD
- Climate Change Strategy and Action Plan
- Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers

Included files

Title Question: Evidence Base

ID EGS14223

Person ID 1270581

Full Name MR & MRS DUNCAN

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS14263

Person ID	1152075
Full Name	Rob Wakely
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:</p> <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan • Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers
Included files	
Title	Question: Evidence Base
ID	EGS14297
Person ID	1270631
Full Name	SIMON LEGG
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	We do not know what the high street will look like post Covid, we have never been in this situation before.

More thought and care is required to assess how our town, which already has a lack of doctors provisions etc will cope with future development of the area.

Included files

Title Question: Evidence Base

ID EGS14308

Person ID 1259141

Full Name Kirsten Riemer

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS14317

Person ID 1270635

Full Name Catherine Bright

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I've referenced the Infrastructure Delivery Plan below against this question - Question 4, if my response would be better located against a different question please do so on my behalf.</p> <p>Page 2 - "The infrastructure delivery lead, cost estimates and funding mechanism will be identified where possible. The funding gap between identified funding stream and total estimated cost of infrastructure to support growth will be identified." This work still needs to be completed therefore the plan is not ready for consultation.</p> <p>Page 2 - "This draft Infrastructure Delivery Plan is not at this stage a complete or comprehensive IDP." This work still needs to be completed therefore the plan is not ready for consultation. Page 154 - Key issues for the Tring include: "High reliance on the private car (43% car journeys to work). Additional housing could result in capacity issues at Tring Station car park New housing could result in more locally generated car trips. Limited opportunities for development within the town given strong existing local and historic character. Increasing primary school capacity issues as forecast by the County Council Schools and Education Service equivalent of 0.9 FE by 2021/22. Increasing secondary school capacity issues as forecast by the County Council Schools and Education Service equivalent of 1.4 FE by 2027/28. Potential under capacity of existing local infrastructure such as dentists and health surgeries. New development could harm the setting of the Chilterns AONB, the Grand Union Canal and other interests of acknowledged importance." The cost of addressing these issues has not been determined and nor have DBC or HCC committed to providing the funding to address these issues. They have only provided a figure for the quantum of developer contributions that will be made - this is not the same as developing a budget to address the issues.</p> <p>Page 155 - There are about £3M of sustainable travel improvements required that need to be funded by Herts CC. Has this been committed to?</p>

Page 156 - Provides the developer contributions (£80M build programme for infrastructure) but not the cost of delivering the infrastructure i.e. has the cost of delivering the infrastructure in this plan actually been estimated? It looks to me that DBC has only provided figures for the amount of developer contribution that will be provided rather than the estimated costs of building the infrastructure. If this is the case then the plan is not ready for consultation because DBC has provided no evidence that they have enough funds to deliver the proposed infrastructure in the plan.

There have been no visible assessments made of either of the two A41 junctions at Tring to assess the impact of a 55% increase in traffic journeys on congestion at these major roundabout junctions. Are DBC assuming that these extra journeys on the A41 (either London bound or Aylesbury bound) will be made by bicycle and on foot like the assumption of the 55% increase in journeys within Tring. Without a proper assessment of the A41 junctions the local plan is not ready for consultation.

Has the impact of new housing developments (through the duty to cooperate) along the A41 in Hertfordshire and Buckinghamshire been assessed by Highways England for the major junction of the A41 with the M25. This junction is already congested without increasing the population of Dacorum by 25% and without the increases in population planned for Aylesbury. Without a proper assessment of this major junction the local plan is not ready for consultation.

Included files

Title Question: Evidence Base

ID EGS14335

Person ID 1270635

Full Name Catherine Bright

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and

contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS14341

Person ID 1270640

Full Name Geoffrey Llewellyn

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

QUESTION: Evidence Base comment

Finally, it is surely clear that the combination of the changes to working life and commuting prompted by the Covid crisis, the Government's "levelling up" agenda and the long-awaited integration of health and social care mean that, however reasonable this plan might have appeared pre-Covid, this is now time for a rethink.

The facts have changed and it is now appropriate for the Council's thinking to change accordingly.

Included files

Title Question: Evidence Base

ID EGS14360

Person ID 1270641

Full Name	WILLIAM ALLEN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The Local Plan was prepared prior to COVID - it does not include changes in patterns of work, travel and use of public amenity space.</p> <p>It does not sufficiently address climate change and the need for radical re-thinking of building and how to reduce its contribution to carbon emissions.</p> <p>The use of out-dated Office of National Statistics data over-inflates the level of housing included in the plan - almost three times above the available evidence of need.</p> <p>There is no mention of the Glover Report, which proposed the AoNB become a National Park. No strategies for or mention of agriculture even though 85% of borough is rural. The Habitats assessment is out of date (2006). No Habitats Regulations Assessment (HRA) documents are published alongside the draft Local Plan for consultation.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14398
Person ID	869011
Full Name	Mr John Savage
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS14408
Person ID	1270653
Full Name	NEIL BRANCH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	The development proposals are based on outdated data (2014 ONS data), more recent data would result in much lower requirements for development. potentially a 50% decrease
Included files	
Title	Question: Evidence Base
ID	EGS14424
Person ID	1270662
Full Name	MAX GOODE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION: Evidence Base comment	LCR and NR generally support the Evidence Base accompanying the emerging Local Plan subject to the comments raised as part of these formal Representations.
Included files	
Title	Question: Evidence Base
ID	EGS14430
Person ID	1270664
Full Name	ASHLEY COLLINS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION: Evidence Base comment	<p>The Evidence Base that accompanies the Strategy for Growth is extensive in terms of the number of assessments and reports which have been prepared. Overall, it is also considered up to date. However, there is one key document which is considered to be flawed in its assessment.</p> <p>The Urban Capacity Study includes several different options for identifying sites which could contribute to the Council’s housing land supply, including those which could be improved, intensified or redeveloped. The study claims to take a proactive approach to site selection, <i>“including considering those not actively promoted but which could play a part in meeting the future development needs of the borough”</i>. It also provides a table of the types of sites and potential data sources used to identify them (see table 1 of the Urban Capacity Study).</p> <p>Within this list, however, there is a fundamental aspect which is excluded. Table 1 duly considers <i>“Additional opportunities in established uses Large scale redevelopment and redesign of existing residential or economic areas”</i> however, there is no mention of existing retail sites being considered. Of course, not all retail sites will be appropriate for redevelopment, improvement or intensification, but there are there are also a number of opportunities which could arise, such as complete redevelopment for alternative uses where the existing retail use is not allocated and/or integral to the Borough’s overall retail strategy; or as part of a mixed-use redevelopment where some existing provision could be retained alongside delivery of other uses, such as housing.</p>

In light of the above, it is considered that a number of sites within the urban area may have been discounted before having even been assessed and which could make a meaningful contribution to the Council's housing land supply without jeopardising the borough's retail strategy.

Included files

Title Question: Evidence Base

ID EGS14441

Person ID 1270665

Full Name Cllr Stephen Claughton

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment The "Berkhamsted and Tring Sustainable Transport Strategy" does nothing to address the issue of traffic congestion, which is the key constraint to further development in Berkhamsted. The topography of the town makes it impossible to develop the road infrastructure. Widening junctions and creating cycle ways will not change this.

Included files

Title Question: Evidence Base

ID EGS14458

Person ID 1265051

Full Name Edmund Knox

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No	
QUESTION: Evidence Base comment	<p>I consider the council ' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council ' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and</p> <p>yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14468
Person ID	1270669
Full Name	Taylor Wimpey Taylor Wimpey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<ul style="list-style-type: none"> The updated evidence base, in particular the Green Belt Study and Site Assessment Study, is supported whereby this supports the allocation of Growth Area Bk06, as discussed

- Taylor Wimpey will continue to work proactively with Dacorum and neighbouring landowners/developers at West of Berkhamsted to prepare a coordinated masterplan to support the delivery of high-quality dwellings and any necessary infrastructure provision, as supported by the draft Infrastructure Delivery Plan.
- Growth Area Bk06 is allocated to deliver around 200 To further assist Dacorum and to demonstrate that the site remains available to contribute towards meeting Dacorum's pressing housing need in the early part of the new Local Plan period, an updated delivery timetable is provided below. The scale of the site enables Planning Permission to be applied for in Full and to come forward as a single phase with Taylor Wimpey operating one sales outlet. Moreover, market conditions in Berkhamsted remain positive, with strong buyer interest in new homes, giving further comfort of Taylor Wimpey's commitment to the early delivery of the site.
- Overall, it is estimated that the site will deliver homes at a rate of around 50 dwellings per annum. This means that a development of 200 dwellings should be completed during a build period of four
- Mapping this out against the Local Plan process, Figure 1 below highlights the potential for commencement of development at the site to be achieved around 18 months after adoption of the Plan, allowing for the grant of Full Planning Permission and discharge of conditions; meaning the site could be built out within 5 ½ years of adoption of the

Figure 1: Indicative Delivery Programme

Year

Local Plan

Planning Application

Completions

2021

Regulation 18 consultation; Regulation 19 consultation

2022

Regulation 24 Examination

Pre-application and local consultation; refresh of relevant surveys; Masterplanning; scoping of any S106 requirements

2023

Regulation 26 Adoption – Q1 2023

Planning application and S106 (Q2 – Q4 2023)

2024

Discharge of conditions (Q1 – Q2 2024)

Commencement of development

(Q3 – Q4 2024)

15 dwellings

2025

50 dwellings

2026

50 dwellings

2027

50 dwellings

2028

35 dwellings

TOTAL

200 homes

Included files

Title Question: Evidence Base

ID EGS14474

Person ID 1270672

Full Name ICP Asset Management Ltd

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes	
* No	
QUESTION: Evidence Base comment	<p>ICPAM has a proven track record of delivering high quality schemes in sustainable locations throughout the UK, with a history of working in partnership with Local Authorities ('LAs'. Having reviewed the Local Plan and Evidence Base, they have identified a number of reasons why the Local Plan is unsound as currently drafted. Should the Local Plan progress to the Regulation 19 Stage and be submitted in its current form, there is every chance that the Local Plan may not even reach examination due to the significance of the issues we have highlighted.</p> <p><u>The Plan is not justified</u>, as it is not the most appropriate strategy based upon the evidence base.</p> <p>These representations request that the Council undertake the following:</p> <ul style="list-style-type: none"> Review the Local Plan and Evidence Base and give greater consideration and prioritisation to the reuse of previously developed land; Revise the Vision to reflect the pressing needs for older person and care accommodation in the Borough and in turn the important role these play in freeing up housing supply elsewhere in the Borough; <p>Recognise the important economic role that care homes provide.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14499
Person ID	1173484
Full Name	Crest Nicholson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
QUESTION: Evidence Base comment	<ul style="list-style-type: none"> The technical studies undertaken by Crest Nicholson's design team have not identified any technical constraints to development of the site, which is consistent with the findings of the majority of the Council's evidence base to date of the site <p>Landscape Sensitivity Study (ARUP, April 2020)</p>

- The Landscape Sensitivity Study was undertaken to inform the Stage 3 Green Belt Review and residential allocations within the emerging Local Plan. Within the Study, the site (Bk05) is assessed as having *neighbourhood* landscape value, which is the lowest value on the assessment scale, due to its absence of identified landscape features of value and *moderate* susceptibility to change from residential development.
- The site is said to have a reduced sense of remoteness caused by the surrounding development and the loss of tranquillity, negative views, and loss of connection with the wider agricultural landscape structure caused by the A41. This analysis further supports the proposed site allocation in the draft Local Plan.

Green Belt Stage 3 Report (ARUP, August 2020)

- The Site was identified in the Green Belt Stage 3 Review (Final Report) (August 2020), which considers the acceptability of potential housing and employment site allocations within Green Belt boundary terms, provide guidance on any required site mitigation, and any consequential changes to the Green Belt boundary.
- TLP has reviewed the Stage 3 Review in relation to the recommendations made for the Site (Site 4), and support the analysis provided for the site, agreeing that all boundaries (except the south-western) are readily recognisable and likely to be permanent and that the south-western boundary potentially needs strengthening. It is noted that the strengthening of the south western boundary is dependent on whether the adjacent Site 16 ('Land between Shootersway and A41 bypass' (Site BK08) to the west of the site) is also released from the Green Belt. TLP advise that if this occurs the A41 boundary would form the new Green Belt boundary, which would form a readily recognisable, durable and likely permanent boundary and there would be no need to strengthen the boundary within the site (Site 4).
- TLP also highlight that if the Site (Site 4) is released, but not Site 16 from the Green Belt then the narrow strip of land within Site 16 that separates Site 4 from the A41, provides little meaningful benefit in Green Belt terms, and should be released, so that the A41 can become the new Green Belt boundary. Similarly, this applies with regard to the narrow strip of Green Belt between the existing houses and the A41 further to south-east i.e. land considered as part of Site
- This is in accordance with the conclusions drawn in the Comparison Landscape Appraisal undertaken on behalf of Crest Nicholson in December 2017, which states that the site warrants release from the Green Belt, and there is ample opportunity to mitigate landscape sensitivities through woodland belt planting along the southern boundary, and tree planting dispersed through site. These mitigative measures have already been developed effectively into the indicative masterplan layout for the site, as discussed

Local Plan Emerging Strategy for Growth (2020-2038) Background Topic Papers

- The Development Strategy Topic Paper provides an outline of the Council's approach to the growth options taken forward in the draft Local Plan. This, along with the Green Belt and Rural Area Topic Paper, conclude that Dacorum '*needs to release land from the Green Belt to meet its development needs, as urban capacity is not sufficient to*

satisfy the housing need figure'. This will continue to be particularly relevant following the review of the figure in the context of the Government's 16th December announcement about the standard method for local housing

Berkhamsted and Tring Sustainable Transport Study (November 2020)

- The Sustainable Transport Study identifies a number of potential sustainable transport improvements to be implemented across Berkhamsted. SP-B1 (from Figure 6-1 of the Sustainable Transport Study) sets out the improvements identified in relation to Shootersway, mainly providing enhancements to walking and cycling facilities along
- The strategy outlined in the Study and accompanying Topic Paper is to focus on sustainable travel initiatives rather than large infrastructure projects that are principally aimed at highway capacity improvements to address peak commuter period delays.
- The Study also concludes that there is opportunity for new or diverted bus services along These will need to be supported by contributions to support early services and the provision of new bus stop facilities.
- Whilst details relating to the delivery of measures and mechanisms for the collection of financial contributions needs to be defined, the strategy which is based on the promotion of sustainable travel modes is
-
- The range of sustainable measures proposed and delivered by all sites should be considered when determining the need to improve highway junctions. This will ensure priority is afforded to sustainable modes which may reduce car travel and avoid the need for highway capacity improvements.

Included files

Title Question: Evidence Base

ID EGS14507

Person ID 1270685

Full Name Ms Jan Kerry

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14517
Person ID	1270383
Full Name	Mr Nigel Kerry
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p>

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS14533

Person ID 1270690

Full Name Akzo Nobel CIF Nominees Ltd

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

Yes, broadly speaking, our client agrees that the Evidence Base supporting the evidence base is adequate, up-to-date and relevant. It is critical the soundness tests set out at paragraph 35 of the NPPF are rigorously applied to ensure the Plan is robust and can be found sound.

Paragraph 66 of the NPPF requires housing need to be informed by the latest evidence. Therefore, the Council must correctly apply the Government's new Standard Method and adopt a revised OAN of 1,023 dpa in the interests of preparing a sound and robust new Local Plan.

In respect to the Council's housing trajectory, there is a great deal of reliance on the delivery of a sizeable proportion (circa 55% or 9,251 homes) of housing in the first half of the Plan Period. Given the Council's recent low delivery rates (Housing Delivery Test (HDT) 2020 result of 89%) this is very ambitious, particularly given current market conditions and the recovery from COVID19. The Council should revise their trajectory and ensure the delivery of homes is more evenly distributed across the Plan Period, whilst recognising the overall trajectory should be revised to achieve at least 1,023 dpa.

Regarding the South West Hertfordshire Strategic Housing Market Assessment (SHMA), this is dated January 2016 and grossly underestimates the current OAN for Dacorum with a requirement for only 756 dpa between 2013-2036. Accordingly, this SHMA should be updated to reflect the predicted growth levels for Dacorum, factoring in the Government's new standard and need for a minimum 1,023 dpa.

It is essential that the new Local Plan is supported by a robust and proportionate evidence base on accordance with the NPPF and the soundness tests set out at paragraph 35.

Included files

Title Question: Evidence Base

ID EGS14543

Person ID 1163978

Full Name John Wignall

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

QUESTION: Evidence Base comment

I consider the council ' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council ' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their all_ocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation

is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS14559

Person ID 1270698

Full Name Ms Elizabeth Hamilton

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

The Draft Dacorum Infrastructure Delivery Plan (November 2020) does however reference the issues of sewage treatment and wastewater transport. Since 2018 work required as the result of new development is delivered by the relevant statutory undertaker. Therefore the Water Cycle Study Scoping Study, part of the evidence base for the Strategy, is out of date (as it is in other respects) and should be revised as a matter of urgency. Paragraph 15.59 of the Delivery Plan document is difficult to interpret but acknowledges that any upgrades needed will be programmed by Thames Water as part of its five- year planning cycle. Most of the proposed growth areas would require upgrades to wastewater provision and these may take 3-5 years, a period at variance with the Water Cycle Study Scoping Study as referenced above in some respects, especially in relation to upgrades which would be needed to waste- water treatment works. It should be noted however that Thames Water is not keeping up with current development rates elsewhere in its area: in the south of Oxfordshire for example houses have been built, sold and occupied with no sewer connections.

Paragraph 15.79 references the response from Affinity Water that ‘There is sufficient water supply in the region’. This is misleading. It is true if you include parts of its supply area (i.e. around the Thames and further south) which are not yet linked by infrastructure to the Dacorum Borough area, and from where transfers are currently planned to be available from 2040. Affinity Water admits that transfer capacity would need to be studied. The water industry is currently engaged in its WRSE process to study ways of getting more water to this region. Affinity is also partnering Thames Water’s proposal to build a massive new reservoir near Abingdon, which could supply Hertfordshire and other parts of Affinity’s area, but which would have huge and devastating environmental impacts. Best estimates suggest that the reservoir would not to

be finished until the end of this plan period. This reservoir is one of a number of options under consideration by the WRSE process.

Included files

Title Question: Evidence Base

ID EGS14574

Person ID 1270700

Full Name Mr Peter Sims

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

No, A lot of it is irrelevant, much is flawed, and most importantly, it's needlessly large and some poorly structure that it's opaque. This is mostly documented above but the highlights are:

- Sustainability appraisal based on "low carbon" not "zero carbon"
- I've included a list of evidence above about the flaws in the key premise underpinning the whole Local Plan, e. the government house building targets.
- As the objective of the Local Plan are incorrect there for key piece of evidence like the transport study are invalid as they assess the wrong things. For instance. The Transport study only assess whether transport can be made "more sustainable" when it should be assessing whether it can be made "zero carbon compatible" inline with the governments national zero carbon target and road to zero The UK climate target is legally binding not aspirational bonus! It's list of interventions are there for completely inadequate.
- Carbon Budgeting doesn't include construction emissions within the year the construction occurs which is an oversight. This means borough will be emitting significantly more GHG's that it's budget allows during years when there is significant construction, but will think it's happily within budget. Such false positives are dangerously misleading, as they could mean the UK or the World is missing it's targets, but all the country/borough think they are doing
- 'South West Herts Economic Study' - Doesn't take account of Pandemic and Climate Emergency, both of which may lead to less/shorter commuting, more working from home, and less big

- Flooding isn't part of climate change mitigation or sustainability, it is a separate environmental concern. It therefore is misleading to list flooding assessments under heading of "climate change and Sustainability" as it gives the impression the local plan as lots of "climate change and Sustainability" evidence when in fact it has very

The biggest problem with evidence base is the size of it. For there to be any accountability or transparency yet the council needs to publish everything (including minutes from all meetings that shape these proposals which are currently absent), but the council also needs to make grant funding available to scrutinise all this information. It cannot publish multiple books worth of information and expect the population over the course of a few months to read and analyse all of it. People independent of the council need to be paid to scrutinise all the information and pull out the key information and issue in formats the public can engage with. I suggest that the Political Foundation model where council makes grants available to political parties to commission external organisations to do detailed scrutiny work based on the number of votes each party received in last election.

Included files

Title Question: Evidence Base

ID EGS14579

Person ID 1270702

Full Name TESCO PENSION INVESTMENT FUND MANAG

Organisation Details C/O Savills

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

Included files

Title Question: Evidence Base

ID EGS14602

Person ID 1270709

Full Name Mr Rodney Tucker

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit will no doubt continue to decrease this projection.
Included files	
Title	Question: Evidence Base
ID	EGS14609
Person ID	1270714
Full Name	Mr Kevin kelly
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit will no doubt continue to decrease this projection.
Included files	
Title	Question: Evidence Base
ID	EGS14623

Person ID	1270726
Full Name	Mr Renshaw Watts
Organisation Details	Pennard Bare Trust
Agent ID	1270725
Agent Full Name	Mr David Carlisle
Agent Organisation	AECOM
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The Green Belt and Rural Area topic paper</p> <p>The topic paper identifies that growth in locations such as Flamstead were considered unsuitable on the following five grounds (to which our client's contest):</p> <ol style="list-style-type: none"> 1. "Does not contribute to sustainable development given the lack of facilities available at these locations" - The settlement of Flamstead, although limited in some services, has a close functional relationship with the nearby village of Markyate to which it is connected by public transport. The proposed sites would not change the existing character and function of the village of Flamstead but would secure appropriate growth to remain sustainable. 2. "Runs the risk of the potential merger of settlements if large Green Belt releases were sought in these locations" - The proposed site allocations would not constitute major development but infill and a natural expansion of the village envelope that would avoid sprawl. As previously set out in this letter, these would respect the overall function of the Green Belt in this location with no coalescence risks. As like the proposed employment allocation to the north of the village, the two sites would represent minor incursions into the Green Belt and would not necessitate the entirety of the village becoming inset. 3. "Would require significant large-scale infrastructure provisions that would make schemes unviable in these locations" - The village already requires some infrastructure improvements that could be secured through a moderate housing uplift. The sites in combination would not trigger the need for extensive on or off-site reinforcements. 4. "The assembly of land and the likely timescales required to deliver this would go beyond the plan period" - As indicated in the 2017 call for sites questionnaire, the sites were identified as available within the first part of the plan period. Furthermore, both sites fall within a single landownership and both sites are available immediately for development and could form part of DBC's five year housing land supply. 5. "Larger scale more appropriate sites have been identified around the main urban areas of Dacorum." - While it is acknowledged that main settlements and Growth Areas will deliver the largest housing development sites, the plan identifies the requirement to bring forward sites in large villages and as infill in small villages diversifying the housing offer. Flamstead is sequentially preferable to many non-Green Belt villages, the Local Plan should re-evaluate the current approach and avoid development in less sustainable locations.

The document states that villages such as Flamstead are more sensitive to change and contain parcels of open land within or on the immediate edge of the villages with many houses sitting on generous open plots. These features are said to contribute towards the general openness of the Green Belt and transition into the open countryside must be preserved. The proposed infilling, outside of the Flamstead envelope, would respect the frequency of these open plots. Furthermore, through high quality design the character and scale of existing housing could be replicated to ensure the development is in keeping with its context.

While the NPPF already provides a mechanism to accommodate some limited development in the Green Belt, a site allocation would help to secure measured and sustainable growth in Flamstead through a comprehensively planned approach.

Green Belt Review – Stages 1-3

To undertake the stage 1 Green Belt review, the study combines the settlement hierarchy of various local authorities. The village of Flamstead is identified as third tier settlement which are, for the most part, washed over by Green Belt, in line with the 2017 Settlement Study.

The review states that while the Green Belt seeks to fulfil a national role it also fulfils an important local purpose, that is, to maintain the existing settlement pattern by protecting against coalescence and maintaining the open land, which helps to define the character of those settlements. The review recognises that local authorities such as Dacorum must therefore balance their review of the Green Belt boundary against their other emerging policies in promoting sustainable development.

The review identifies areas within the Green Belt contributing least to Green Belt Purposes. While the sites identified in this letter do contribute towards some of the purposes of the Green Belt, we consider that their development would not adversely prejudice the overall function of the Green Belt in this location.

To date the stage 1-3 Green Belt assessments have not assessed in any detail potential housing sites surrounding the larger Green Belt and Rural Area villages. As demonstrated by the settlement hierarchy study Flamstead outperforms less well served and less accessible non-Green Belt villages where small scale developments would be permitted under the draft policies in the consultation document. This is the perverse outcome of ruling out any Green Belt sites beyond Hemel Hempstead, the market towns and large villages.

Figure 4.2 within the stage 3 Green Belt report (see Figure 3 – below) provides a helpful illustration setting out how Green Belt purpose 1 can be visualised and highlighting where enclosed infill may be appropriate for future development in the Green Belt.

Flamstead has only been assessed as part of a much larger parcel (GB18A – Partial Green Belt Land to West of Markyate) within the Stage 1 report Green Belt Review Purposes Assessment. Annex 1 – Parcel Assessment Sheets for Dacorum Borough Council (November, 2013). The Principal Function / Summary states that GB18A makes a:

“Significant contribution towards checking sprawl from Luton and Dunstable, safeguarding the countryside and maintaining the existing settlement pattern. Partial contribution towards preventing merging and preserving the setting of Flamstead and Markyate. Overall the parcel contributes significantly towards 3 out of 5 Green Belt purposes.”

None of the functions noted (above) would be precluded through the development of parcels 53 and 55 in Flamstead. The stage 1 report is now over 7 years old, our clients request that due consideration is afforded to the villages washed over by the Green Belt (as per the methodology applied in the stage 2-3 review). Especially for sustainable infill sites

such as our client's landholdings that can positively contribute to DBC's local housing need (now set at a minimum of 1,023dpa).

The Development Strategy topic paper

This topic paper reinforces the Council's view that smaller settlements have greater constraints and sensitivities and therefore limited capacity and scope of services.

The topic paper however confirms that the Growth Strategy approach, set out in the Draft Local Plan, does not rule out opportunities for contribution from smaller scaler development in the countryside, "modestly supporting their services with a small increase in population". The topic paper goes on to cite village infilling and rural exceptions for affordable housing on the edge of rural settlements and the role that Neighbourhood Plans can play in supporting this moderate growth. The site allocations 53 and 55 at Flamstead would constitute a moderate growth and sustainable growth approach for villages of this size.

The Site Selection topic paper

The topic paper justifies the exclusion of some smaller sites in villages from detailed testing as they would likely result in less sustainable forms of development and further limit access to services and facilities. The paper specifies that these sites have been assessed individually and in combination before being discarded from further consideration. Site allocations 53 and 55 however appear to have been omitted from the detailed testing solely on the basis that they were located in greenfield sites in the Green Belt. We believe this site selection approach wrongfully and prematurely dismisses sustainable sites with limited environmental constraints that offer opportunities for sustainable development in village locations.

DBC Site Assessment Study - Volumes 1-4 (AECOM, January 2020) and Addendum (November 2020)

The DBC Site Assessment Study Volume 3 assesses all sites submitted as part of the call for sites, identifying key transport, environmental, economic and spatial conclusions. While the January 2020 Site Assessment Study Volume 3 identified the two Flamstead sites as unsuitable for allocation, this was principally on the basis that the sites are within the Green Belt (emphasis added):

"Site performs relatively well on most criteria. However it is greenfield land in the Green Belt in a location where it is not proposed to release Green Belt and as such is considered unsuitable for allocation." – Site 53

"Site is very constrained in terms of access but otherwise performs well on wide range of criteria. However it comprises greenfield land in the Green Belt in a location where it is not proposed to release Green Belt land and any redevelopment cannot result in a decrease in the site's existing openness. Therefore, the site is considered unsuitable for the purposes of this study." – Site 55

The sites present very limited constraints in terms of suitability, achievability and availability of development and present legitimate considerations for Local Plan allocations.

The DBC Site Assessment Study Volume 3 recognises that both sites have merit as locations for development. It also notes a number of potential constraints, we have addressed these concerns (Table 1 - overleaf) providing an update on a number of matters.

Settlement Hierarchy Study Main Report (October 2017)

The latest settlement hierarchy study dates from 2017 and formed part of the evidence base for the partial review of the 2013 Core Strategy DPD. As mentioned in the document: "A key part of the evidence base is an assessment of the

sustainability of all the settlements in the Borough alongside an assessment of their ability to accommodate growth". In the local context it is recognised that Flamstead remains smaller in size and service provision when compared with neighbouring Markyate. While the strict village envelope might be that of a 'Small Village', this excludes adjacent developments reliant on Flamstead. To that end we believe that a review of the settlement hierarchy study should be undertaken and consider re-assigning Flamstead to 'Large Village' allowing it to accommodate future growth, while respecting the fundamental aims and purposes of the Green Belt. The two sites in combination offer opportunities for the two sites to be comprehensively planned, including community benefits.

The settlement hierarchy description for Small Villages in the Green Belt suggests that these sites fall in an area of significant environmental constraints and include areas of high landscape quality. This is not the case for parcels 53 and 55. While parts of Flamstead are covered by significant environmental and landscape constraints, the locations of the sites in question, outside of the settlement boundary, are not.

The Study ranks settlements according to their population size and the range of services and facilities they provide. Furthermore, it is informed by an understanding of their relationship with other settlements and accessibility. The Emerging Local Plan mentions the relationship between Flamstead and Markyate and the need for the latter to grow in order to overcome its village centre decline. Given the reliance of Flamstead on Markyate's services, a population growth at Flamstead would likely help in supporting and stabilising the vibrancy and vitality of Markyate's village centre as well as Flamstead itself.

The Settlement Profile paper published in 2017 to support the Settlement hierarchy study included Parish Council comments. These mentioned a need for more frequent bus services and better broadband speed. These infrastructure requirements could be achieved through well planned growth in the village.

Tables 2 and 3 (overleaf) are combined in the study to provide an overall Settlement Hierarchy Assessment (see Table 4). This shows that Flamstead is a sequentially preferable location to the locations where the proposed policy framework (as per the consultation document) would support growth in less sustainable locations and thus disincentivises growth Flamstead.

Urban Capacity Study - Main Report (November 2020)

The Urban Capacity Study identifies that the borough has an estimated urban capacity for approximately 10,440 dwellings and an estimated 514 dwellings in rural areas. The study also recognises that the Local Plan should, when considering any release of land from the Green Belt, fully recognise the borough's existing capacity. As further requirements have been identified through the new housing needs assessment method, further pressure is placed on this existing capacity. Markyate is identified as one of the borough's six main settlement. Its proximity to Flamstead positions the latter as a satellite of Markyate. With further growth at Markyate the moderate growth proposed at Flamstead on our client's landholdings would not conflict but offer proportionate growth across the area, further encouraging economic development and boosting the vitality at Markyate and Flamstead.

Hertfordshire Landscape Strategy Landscape Character Assessment for Dacorum SPG (May 2004)

The Landscape character assessment for Markyate Ridges and Valleys (see Figure 5 - below) identifies Flamstead as lying on a ridge and therefore less concealed from views than other parts of the character area. The document notes that some areas of arable land at Flamstead are however 'quite open'. The assessment also identifies built development

on the settlement fringe of Flamstead as being generally of low impact. However, within the area views are “framed and filtered by landform and overgrown hedgerows and woodland belts”.

In terms of conditions, the management of semi-natural habitat is characterised as ‘not obvious’ leaving room for improvement. Further development can create opportunities for further mitigation and enhancement of the existing natural environment (including biodiversity net gain and improved access to the countryside in this location). The proposed development sites would also constitute infill and therefore maintain the ‘localised’ nature of land coverage in this character area.

Dacorum Borough Landscape Sensitivity Study (April 2020)

The document adds to the Landscape Character assessment made for Markyate in the Dacorum landscape character assessment, identifying the St Leonard’s Church spire at Flamstead as a local landmark. Any development at Flamstead will need to consider the impact on views of the spire. The

proposed site would be allocated for housing development and would need to meet the existing low density character, respecting the existing character and heritage of the village.

The presence of the Chilterns AONB designation of national importance would also be respected with design sympathetic to the local character however the distance of the sites means that the impact would most likely be negligible. Development would also seek to respect the recreational value attached to PRowS and seek to enhance these, in line with the NPPF.

Included files

Title Question: Evidence Base

ID EGS14631

Person ID 1270729

Full Name MR & MRS A HOUGHTON

Organisation Details

Agent ID 1270728

Agent Full Name MS
KAREN
GALLEY

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment	<p>Whilst there has been effort to assess Green Belt, in terms of its character, appearance and contribution across the Borough, the allocation of such land for development does not consider individual characteristics e.g green belt on 'best and most versatile' agricultural land, and its associated impact.</p> <p>I am concerned about the sufficiency and validity of evidence that supports the expressed need for the number of homes to be built and the necessitation of using Green Belt in areas of natural outstanding beauty.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14641
Person ID	1270731
Full Name	MRS JOAN EELEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base

ID	EGS14651
Person ID	1265051
Full Name	Edmund Knox
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council ' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council ' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and</p> <p>yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14669
Person ID	860814
Full Name	Mrs Clare Joyce
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	Insufficient time to review
Included files	
Title	Question: Evidence Base
ID	EGS14685
Person ID	1270739
Full Name	HELEN OSBORNE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation</p>

is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS14695

Person ID 1270740

Full Name JOHN OSBORNE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS14707

Person ID	1270752
Full Name	DOUGLAS CANNON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and</p> <p>yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14719
Person ID	1270753
Full Name	ANNE PIKE
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14769
Person ID	1270760
Full Name	LQ Estates
Organisation Details	LQ Estates
Agent ID	1270759
Agent Full Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	Development Strategy and Urban Capacity Study

7.5 The Development Strategy Topic Paper acknowledges that Green Belt covers over half the Borough with the AONB overlapping and extending beyond this. In practice this means that most of the land outside of the key settlements is identified as areas of development restraint. Green Belt boundaries may be reviewed through the Local Plan process. This does not apply to the AONB. This Paper sets out the various options which have not been pursued and explains the rationale for the preferred strategy based on meeting development needs; capacity and delivery infrastructure; 'Footnote 9' constraints (now Footnote 6 in 2019 NPPF); and sustainable locations. This is then reflected in emerging Plan's spatial strategy, delivery strategies and proposed allocations. This approach is supported as it allows for growth to be delivered in the most sustainable locations and where infrastructure can be provided to support this. This approach aligns with national policy (paragraph 138 of the NPPF) which is clear that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.

7.6 The Urban Capacity Study provides a comprehensive assessment of the capacity for urban sites to meet housing need in the Borough. This includes consideration of previously allocated sites, new proposed allocations and windfall sites. It is considered this effectively captures all available urban sites. It is also noted that high density assumptions have been made on the vast majority of sites to make best use of development land. The Study concludes that there is an estimated urban capacity of approximately 10,440 dwellings within the Borough.

The Urban Capacity Study also notes that there is a total estimated rural capacity of 514 dwellings. This gives an overall capacity for the Borough of circa 11,000 dwellings. It is clear that there is not sufficient capacity to deliver the minimum housing need identified, even before this is revised to reflect the standard method figure. This means that further sites will need to be allocated through the Local Plan process. It also provides the evidence substantiating the need to review the Green Belt in order to deliver the minimum housing need for the Borough. This supports the exceptional justification required to amend Green Belt boundaries.

Green Belt Review – Stage Three

7.7 At this Stage, the purpose of the Green Belt Review is to assess potential site allocations that lie within the Green Belt, consider the acceptability of the sites in Green Belt boundary terms and provide site-specific advice on any mitigation required.

7.8 In terms of New Mill Table 4.1 recommended strengthening of the Green Belt if released. This was the recommendation for thirty of a total of 34 sites assessed. Table 5.1 presents the Summary of Landscape Findings, New Mill was assessed as being of neighbourhood value of moderate susceptibility and sensitivity. Other proposed allocations in Tring were also assessed as being of neighbourhood value of moderate susceptibility and sensitivity with the exception of East of Tring which is moderate-high.

7.9 Figure 6.13 shows the land to be removed/added to Green Belt and new Green Belt boundary for Tring. New Mill (reference 132) is shown to be removed from the Green Belt. The existing boundary to the north-west of the site is not proposed to change and Bulbourne Road will remain as the clear, defensible boundary. Further land is proposed to be removed from the Green Belt to the north-east/east of the site through a proposed allocation known as East of Tring (reference 124). The amended boundary will be beyond this allocation rather than directly adjoining New Mill.

Site Selection

7.10 The Site Selection Topic Paper draws the various evidence base documents and sets out how these have influenced site selection decisions. This paper works through the methodology from and NPPG.

7.11 Drawing on the Urban Capacity Study discussed above, this Paper also sets out that it is not possible to meet future housing requirements within the built-up area of the six main settlements. The Paper works through Paragraph 137 of the NPPF which sets out that for exceptional circumstances to exist it must be demonstrated that all other reasonable options for meeting the identified need have been fully examined. This includes:

- a) Makes as much use as possible of suitable brownfield sites and underutilised land;
- b) Optimises the density of development in line with Chapter 11 of this Framework;
- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

7.12 In terms of (a) and (b) it is agreed that the Urban Capacity Study (which also considers rural capacity) has clearly considered opportunities for previously developed and underutilised land. The densities recommended in the Urban Capacity Study are high, notably in Hemel Hempstead which as the strategic settlement can accommodate higher densities. The evidence base supports that these two options have been fully explored.

7.13 In terms of (c) the Paper notes that neighbouring authorities are similarly constrained by Green Belt and AONB. This will need to be supported by relevant Statement(s) of Common Ground at the next stage of plan preparation.

7.14 In terms of land not designated as Green Belt or AONB, only five parcels of land have been promoted for development with an estimated development potential of 128 dwellings. This is not sufficient to meet the identified needs and, due to the location of non-designated land, would not reflect sustainable patterns of development. The Paper sets out that the option of a new settlement outside of the Green Belt has also been considered but there has been no evidence presented that this would be deliverable or developable in the Plan period. It is agreed that this option may be discounted for this Plan.

7.15 Table 7 sets out the justification for excluding sites from detailed testing. This reasoning is clearly explained and this approach is supported.

7.16 Table 16 sets out the recommended allocations for Tring. This includes three new allocations and two existing allocations. Paragraph 6.17 explains that significant growth in Tring will enable the delivery of new infrastructure and consolidate the town's role as the most sustainable location outside of Hemel Hempstead and Berkhamstead. This approach is supported and closely aligns with the spatial strategy set out at Policy SP2. Paragraph 6.18 continues that sufficient mitigation can be provided through site-specific policy and other policy requirements included in the draft Plan. This is supported and a number of the policies are discussed in the preceding section. This is discussed with reference to New Mill in Section 8.

Included files

Title Question: Evidence Base

ID EGS14789

Person ID	1142710
Full Name	Mr Chris Stoneman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council 's Green Belt assessment as not up to date: The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review: The council's assessment of Green belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green-Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14800
Person ID	1270798
Full Name	SAYED BEL-BAROO
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider; the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual•characteristicsof the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14807
Person ID	1264510
Full Name	Martin Evening
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>6. The DLP Sustainable Transport Study does not show current volumes of traffic flow, and then that projected at the end of the Local Plan, arising from the proposed new homes/population growth. Therefore, the Draft Local Plan does not define the social impact of the proposed growth in the town and the reduction in the quality of life to the existing citizens.</p>

On further inspection its facts/figures/evaluations do not use consistent base markers for data/statistics and does not clearly state the source/date/nature of the information. An example is Berkhamsted, the DLP has statements where the population data sometimes is Berkhamsted only, sometimes includes Northchurch, sometimes 2011 census and sometimes 2015/2017/2019. There is no clear base figure that is being worked to, so it is not easy to understand the potential impact.

Included files

Title Question: Evidence Base

ID EGS14816

Person ID 1270802

Full Name Mr Edward Blogg

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

The numbers are questionable. The government initially based the numbers on a formula now known as 'The mutant algorithm'.

In December the government announced it would ditch this algorithm — many reasonably thought that the proposed numbers in the local plan would therefore fall. BUT THE GOVERNMENT CHANGED THE STATISTICS TO JUSTIFY THE NUMBERS ANYWAY — THE NUMBERS OF PROPOSED HOUSES HAVE THEREFORE INCREASED...shocking!

Included files

Title Question: Evidence Base

ID EGS14818

Person ID 1270802

Full Name Mr Edward Blogg

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>Dacorum's Local Plan is not in keeping with its own attitudes in its Draft Site Sustainability Appraisals and its Draft Infrastructure Delivery Plan. The latter saying for the Shootersway sites.</p> <p>“ Development of this site would likely result in an increase in traffic to and from the site at peak hours, which would have a limited impact upon the local road network. If larger scale growth is proposed in the south west of Berkhamsted, it is likely that this would give rise to further traffic issues along Shootersway, particularly at the junction with the A416/Kings Road and the A41 junction. “ For Darr's Lane, wording is amplified:</p> <p>“...Development is likely to have an impact on the local road network at peak periods, including along Shootersway and Kings Road/A416. Significant improvements would likely be required, including enhancements to Darr's Lane, Durrants Lane, Berkhamsted High Street, Shootersway, Kings Road and the A416. “</p> <p>Similar remarks are included in the Draft Infrastructure Delivery Plan (App B) that some of the sites are relatively close to bus transport :</p> <p>Haslems Field = “Site is a 15-20 minute walk from the frequent 500/501 service to Watford. The 502 and 532 bus service to Hemel Hempstead is a 10 minute walk and is infrequent in comparison to the 500/501 service. “</p> <p>Darr's Lane = “Site is within walking distance to the frequent 500 bus services to both Watford and Aylesbury. Site is also within walking distance to the less frequent bus service of 532 to Hemel Hempstead.</p> <p>A site of this scale has the potential to provide new/enhanced public transport connections with the existing town and wider area. “</p> <p>Sites might be 15-20 minutes walk to access the A4251 and main bus services. BUT Up-hill on way home tired, then time = ?? What about on cold winter days, dark morning and dark evenings??</p> <p>Equally not easy for young mum with young family in tow during the daytime – particularly on bad weather days. What about infirm etc.</p> <p>Now add to above, for Darr's Lane, that for half of the 1.2Km walk to the A4251, the route is single-track, no street-lights, and no pathways.</p>

Included files	
Title	Question: Evidence Base
ID	EGS14829
Person ID	1270804
Full Name	Dr Jessica Field
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS14846
Person ID	325470
Full Name	Gardener Family Trust
Organisation Details	Gardener Family Trust

Agent ID	1270807
Agent Full Name	Mr Alistair Brodie
Agent Organisation	Henry H Bletsoe & Son LLP
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Simply on the basis that the plan envisages an over reliance on large strategic sites and the delivery of and redevelopment of brown field sites within the town, rather than allocating sufficient new small and medium sized green field sites for housing development.
Included files	
Title	Question: Evidence Base
ID	EGS14858
Person ID	1270808
Full Name	Westmorland Limited
Organisation Details	Westmorland Ltd
Agent ID	1270759
Agent Full Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>Section 10 of this Paper sets out the Council's approach to providing employment land within the Green Belt. It is anticipated that much of its employment need will be met within St Albans boundary, however, there is still a need to deliver some additional employment growth to meet the needs of the Borough. Five sites are identified for this purpose:</p> <ul style="list-style-type: none"> • Bovingdon Brickworks (expansion), Bovingdon • Bourne End Mills (expansion), Bourne End • Dunsley Farm, Tring • Land at the corner of A41 and Two Waters Road, Hemel Hempstead

- Watling Street Truckstop, London Road Flamstead

Of these sites, four are in the Green Belt and are small in scale. The exception is Dunsley Farm which will come forward as part of a proposed housing allocation.

The Council believes that the approach to providing the employment land sites is consistent with the NPPF paragraph 145, which relates to forms of development that are 'appropriate in the Green Belt'. Although, not identified in the Background Topic Paper, it is considered that paragraph 146 would apply to Watling Street Truckstop, as this is local transport References to the mechanisms for delivering the land could helpfully be included in Policy SP11.

Paragraph 10.14 confirms that *“The expansion of the Watling Street truck stop has been demonstrated to be an essential piece of infrastructure given Dacorum's location along the M1 and the critical level of need for the expansion of services in this location”*. As identified above, the preference is for the site to be removed from the Green Belt entirely, it is considered that this would form the exceptional justification for removing this site from the Green Belt as per comments in relation to Policy SP11.

In line with national policy, the Policy considers the need for appropriate and defensible boundaries. If Watling Street Truckstop was to be removed from the Green Belt appropriate and defensible boundaries could be This is discussed further in Section 6.

Further Comments

It is recognised that the Plan is currently at Regulation 18 Stage and that the evidence base will continue to evolve and be built upon as the Plan progresses. It is considered that the inclusion of the Maylands Growth Corridor Study Stage 2 Options and Strategy Scheme Concept 7 Option Report, prepared by Hertfordshire County Council and LEP, and National Survey of Lorry Parking 2017, Highways England, would be helpful to be included as both demonstrate the need for additional HGV parking in this area. The Hertfordshire County Council Chequers Hill and A5183 Junction Improvement scheme could also be helpfully referenced in the evidence base, as a further component that the proposed development will seek to address.

Included files

Title Question: Evidence Base

ID EGS14864

Person ID 1265016

Full Name Charles Aylwin

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	
QUESTION: Evidence Base comment	(no comment)
Included files	
Title	Question: Evidence Base
ID	EGS14869
Person ID	1145605
Full Name	
Organisation Details	Premier Property Acquisition
Agent ID	1145599
Agent Full Name	Mr Jonathan Buckwell
Agent Organisation	Director DHA Planning
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>The Dacorum Landscape Sensitivity Study assessed the greenfield allocations in Berkhamsted as set out in the table below. Our client's site was identified as having a lower landscape susceptibility and sensitivity than BK01, BK04, BK06 and BK09 and an equal sensitivity to BK03 and BK05. It is noted that BK06 and BK08 both lie adjacent to the AONB as does our client's site. No differentiation in impact of the AONB has been identified in the Landscape Sensitivity Study but none of the sites have been identified as having a major contribution to the setting of the AONB.</p> <p>Value Susceptibility Sensitivity BK01 South of Berkhamsted</p>

Neighbourhood

Moderate-High/High

Moderate-High/High

BK03 Haslam Playing Fields

Neighbourhood

Moderate

Moderate

Bk04 Land between Hanburys and A41

Neighbourhood

Moderate-High

Moderate to High

BK05 Blegberry Gardens

Neighbourhood

Moderate

Moderate

BK06 Land east of Darrs Lane

Neighbourhood

Moderate-high

Moderate

BK07 Lockfield

Neighbourhood

Moderate

Low-Moderate

BK08 Land between Shootersway and A41 Bypass

Neighbourhood

Low-moderate

Moderate-low

BK09 Bank Mill

Neighbourhood

Moderate-High

Moderate-High

BK10 Hamburys

Not assessed

-

-

Clients site

Neighbourhood

Moderate

Moderate

Green Belt

The 2016 Stage 2 Green Belt Review and Landscape Appraisal concluded that the development of our client's site would represent "infill within the existing settlement footprint", that it "would not have any tangible impact upon the separation of the settlements", and that "with appropriate screening along its eastern boundary, it would not compromise the integrity of the wider Green Belt."

The proposed site was categorised, in terms of 'the strength of the Green Belt against NPPF Purposes', as 'weakly contributing' whereas the locations of BK05, BK06 and BK08 were all identified as 'moderately contributing'. Our client's site was therefore stated as 'not compromising the ability of the wider Green Belt to meet its purposes' where as BK06 is stated as having the potential to partially compromises the ability of the Green Belt to meet its purposes.

The assessment concludes that BK8 'would compromise the ability of the wider Green Belt to meet its purpose' and was excluded from further consideration. However, the site appears to be included in the Stage 3 Green Belt Review Final Report. This report makes no distinction between BK05, BK06 and BK8 in terms Green Belt purpose or effect thereon.

It is not clear why this is the case as the areas defined in in the Stage 2 report do not materially differ to that those defined as the site allocation boundaries in the Stage 3 report.

Notwithstanding this it is clear that the impact from the development of the proposed site would represent infill within the existing settlement footprint and would have materially less impact on the Green Belt than BK06 and BK8 that would result in pushing built form into the Green Belt and extending the existing defined settlement boundary.

Included files

Title Question: Evidence Base

ID EGS14902

Person ID 1144629

Full Name Mrs SOPHIE LAWRANCE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

The evidence base is certainly extensive - too much so for individuals to review in its entirety, or to comment on in any detail. However, a key concern is that the Plan does not appear to have full regard to all of the prior studies - for example, as explained in Section 5 above in relation to sites Bk06 and Bk08, the Green Belt Phase 1 and 2 studies which did support the extensive development on Green Belt sites now countenanced.

Included files

Title Question: Evidence Base

ID EGS14909

Person ID 1270828

Full Name Owen Ellander

Organisation Details Head of Property Development
Greene King Brewing and Retailing Ltd

Agent ID 1270829

Agent Full Name Mrs
Helen
Binns

Agent Organisation	Walsingham Planning
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Land is included within the Green Belt that does not satisfy any of the purposes for including land within the Green Belt - see letter of representation from Walsingham Planning.
Included files	
Title	Question: Evidence Base
ID	EGS14923
Person ID	329628
Full Name	McCarthy & Stone Retirement Lifestyles Ltd
Organisation Details	McCarthy & Stone Retirement Lifestyles Ltd ("The Retirement Housing Consortium")
Agent ID	1270838
Agent Full Name	Miss Carla Fulgoni
Agent Organisation	Planning Appeals and Policy Manager The Planning Bureau Ltd
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	We are concerned that there is no viability evidence underpinning this plan. Without this we are unable to test the application of policies against the viability of retirement or extra care housing. We would welcome the opportunity to scrutinise this if and when one is available.
Included files	
Title	Question: Evidence Base
ID	EGS14937
Person ID	1270839
Full Name	EMMA WELLER
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS15007
Person ID	869019
Full Name	Mrs Shelley Savage
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS15035
Person ID	1270846
Full Name	PETER ATKIN
Organisation Details	ASSOCIATE
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>6.0 The updated evidence base, in particular the Green Belt Study and Site Assessment Study, is supported whereby this provides justification for the allocation of land at Homefield, Bovingdon, as discussed above.</p> <p>6.1 To further assist Dacorum and to demonstrate that the site remains available to contribute towards meeting Dacorum's pressing housing need in the early part of the new Local Plan period, an updated delivery timetable is provided below. Land at Homefield is proposed to deliver around 145 dwellings in total. The scale of the site enables Planning Permission to be applied for in Full and come forward as a single phase, with Taylor Wimpey operating one sales outlet. Moreover, market conditions in Dacorum remain positive, with strong buyer interest in new homes, giving further comfort of Taylor Wimpey's commitment to the early delivery of the site.</p> <p>6.2 Overall, it is estimated that the site will deliver homes at a rate of around 50 dwellings per annum. This means that a development of 145 dwellings could be completed during a build period of around three years.</p> <p>6.3 Mapping this out against the Local Plan process, Figure 1 below highlights the potential for commencement of development at the site can be achieved around 18 months after adoption of the Plan, allowing for the grant of Full Planning Permission and discharge of conditions; meaning the site could be built out completely within four years of adoption of the Plan.</p>

Included files	PEGASUS GROUP.pdf
Title	Question: Evidence Base
ID	EGS15041
Person ID	1250021
Full Name	Hallam Land Management Ltd
Organisation Details	Hallam Land Management Ltd
Agent ID	1265070
Agent Full Name	Stacey Rawlings
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	The evidence base underpinning the urban area sites is inadequate and further information is required to demonstrate that the anticipated level of market and affordable housing is reliable.
Included files	
Title	Question: Evidence Base
ID	EGS15049
Person ID	1250021
Full Name	Hallam Land Management Ltd
Organisation Details	Hallam Land Management Ltd
Agent ID	1265070
Agent Full Name	Stacey Rawlings
Agent Organisation	
Yes / No * Yes * No	No

**QUESTION: Evidence
Base comment**

Housing Trajectory:

No draft housing trajectory has been included within the draft Plan. HLM consider this omission is unacceptable as the ability to meet the housing requirement in the plan period is fundamental to any consultation on preferred options. It is necessary to understand the Councils assumptions on the rate of housing delivery expected by the identified brownfield and greenfield sites to be able to respond on whether the proposed approach is likely to be appropriate and achievable by 2038.

Anticipated delays in bringing forward a consistent supply of housing through reliance upon urban capacity sites and at HGC will impact upon the plans ability to deliver the required growth by 2038. We do not consider there is sufficient flexibility built into the housing trajectory. The Council should provide an updated housing trajectory to reflect the likely adoption date and any changes to the 2019/20 completions and the anticipated 2020/21 completions based on current knowledge of planning applications and sites.

HLM consider that additional sites may be required to plug the gap between the housing requirement and the housing trajectory. Such sites should be identified at the principle town as a priority, given that it is likely to be the settlement where the trajectory falls short. Opportunities at the edge of Hemel should be revisited and reassessed to identify sites to meet additional need. This includes Land at Berkhamsted Road (site 78). The site performed well against the SA criteria and is a suitable candidate for a phased delivery of housing to ensure that the strategy can deliver at the anticipated pace.

HGC:

The approach taken in the Local Plan preparation is unduly influenced by the Councils desire to deliver HGC. This has shaped how the spatial strategy and site selection process has been undertaken. As it has been an input at the early stages of formulating the strategy, all work has been tailored to achieve a pre-determined outcome from the various assessments, rather than it being a fair and transparent process. There is a lack of evidence to support the inclusion of HGC in this draft Reg 18 plan.

In terms of opportunities, HLM recognise the longer term strategy of providing opportunities to deliver significant improvements to infrastructure (schools, highways and healthcare) through the garden communities programme which could benefit existing as well as new communities and help deliver St Albans housing requirements in a sustainable way. HLM considers that strategically planned development in Hemel Garden Communities in the north-eastern part of the town could provide longer-term solutions to transport challenges in the vicinity. However, the delivery of Phase 1 within the plan period, without the certainty of the route alignments and certainty of the wider strategy being delivered (St Albans Local plan failed) is premature in advance of the South West Hertfordshire Spatial Plan. The joint Councils have opted to prepare a strategic framework to deliver cross-boundary solutions to future development. This is the correct process to bring forward HGC site for development.

There is no clear evidence supporting the delivery of new infrastructure for HGC. We acknowledge the Council's historic vision to provide a relief road for HGC. However, there is no certainty that the extent of development proposed is capable of being achieved and to deliver the new road infrastructure. There is a lack of clarity surrounding the infrastructure requirements that are proposed to demonstrate delivery of Phase 1 in a timely and efficient manner.

HLM are not aware of any detailed strategic site options assessment as part of the evidence base or the consideration of reasonable alternatives to date to the preferred spatial strategy. There has been no comparative assessment to Phase 1 of HGC through the SA process. It is not clear how the Council has considered the relative performance of other large sites. There are no clear parameters set out within the SLAA, the SA process or the subsequent site selection topic paper (November 2020).

HLM can find no evidence of sites being considered cumulatively to deliver strategic-scale extensions at sustainable settlements, including Hemel. The only option that appears to have been considered in any meaningful way is HGC.

Overall, HLM observe that the site sifting process that was undertaken was not objective and has been biased by a preferred strategy of delivering the HGC allocation to provide a phase 1. There is no evidence available to understand what infrastructure is required to be delivered alongside Phase 1, whether the land is under control or how any early development will safeguard the key infrastructure principles required to deliver the full HGC scheme, including the nature of the transport hub.

Gaps in Transport Evidence:

The Dacorum Local Plan Emerging Strategy for Growth (2020-2038) is informed by a number of transport related studies and evidence base, all of which is available for scrutiny as part of this round of consultation. These include a Transport Topic Paper (November 2020), a Dacorum Local Plan Strategic Transport Modelling Report (July 2020), a Berkhamsted and Tring Sustainable Transport Study (October 2020) and a draft Infrastructure Delivery Plan (November 2020).

The Local Plan also refers to a Hemel Hempstead Sustainable Transport Study, produced in conjunction with Hertfordshire County Council (HCC), described as the document that will identify the interventions necessary to support the development of Growth Areas, specific sites, and to inform the Infrastructure Delivery Plan. Indeed, the Site Selection Topic Paper (November 2020), states at Table 13 that the Study has been used to inform the site allocations in relation to access, highways and sustainable transport.

However, despite the weighting of DBC's housing and employment allocations toward Hemel Hempstead, the Hemel Hempstead Sustainable Transport Study has not, as yet, been included within the evidence base and we understand there are no plans to release this during this round of consultation. Given the strong reliance the growth aspirations are placing on a transport strategy that promotes sustainable travel at both a site wide and across the settlement, it is believed this document should form part of this round of consultation so that the justification for specific site allocations can be considered in full.

Other documents are also referenced within the evidence base, such as the Hemel Garden Communities Transport Plan, which also does not appear to form part of this round of consultation. Given local plan allocations include part of the Garden Communities to the north of Hemel Hempstead (site HH01) and land to be safeguarded for a future phase (site HH02), it is believed that this Transport Plan should also be available for scrutiny at this time, to ensure the various studies are complementary and the cumulative impact of development in this area has been tested and a mitigation strategy adopted.

There is some concern therefore that this round of consultation is inviting comment on potential site allocations without sufficient evidence having been presented, given the link between their allocation and the associated transport strategy.

Unclear Strategy and Traffic Model Assumptions:

The evidence base includes a Strategic Modelling Report, dated July 2020, prepared by AECOM, and a Transport Topic Paper, dated November 2020, prepared by ITP.

The Modelling Report details the results of COMET testing for potential development scenarios within DBC, compared against a baseline scenario. The development scenarios allow for an assumed scale of development totalling 2,000 units within the North Hemel Hempstead site. No other specific sites within Hemel Hempstead are referenced within the modelling analysis and instead, 'background growth' across DBC is referenced. It is worth clarifying therefore if the other draft allocations within the emerging Local Plan, which weight development toward Hemel Hempstead, have been sufficiently allowed for within this modelling assessment as this is unclear. Clarification should also be provided regarding assumptions on scale of employment development within Maylands and the adjacent Enterprise Zone.

The development scenarios include the provision of a Northern Link Road through the North Hemel Hempstead site allocation as either a link between Leighton Buzzard Road and Redbourn Road, or a shorter version that connects Leighton Buzzard Road with Link Road. The results of the modelling suggest that the longer link road would perform a strategic function and attract a greater redistribution of strategic traffic along this route, resulting in more traffic also accessing the M1 Junction 8 via a potential new spine road through Maylands.

The analysis of the shorter link road scenario suggests that it will not perform this strategic function, instead only attracting local traffic and resulting in more traffic using the A414 through Hemel Hempstead. Reviewing the assumed alignment of the shorter link road within the COMET report does raise some queries however as to its function as it connects with Link Road only a short distance east of the existing Leighton Buzzard Road junction and appears to simply operate as the second form of access for the North Hemel Hempstead site allocation. This is evident in Figures 5- 40/5.41, where only a small number of vehicles are shown as using the route (115 two way flows in the AM peak and 138 vehicles in the PM peak).

Ultimately, the analysis concludes that delays and stress levels across either of these scenarios are broadly similar, but does not go as far as to recommend which scenario should be adopted in terms of the link road.

The Transport Topic Paper then provides a summary of the transport evidence base prepared to date to inform the Local Plan, including this COMET report, summarising the package of transport interventions that are available to support the growth aspirations, acknowledging that this will evolve as part of the current round of consultation.

With regards to the Northern Link Road option, the Paper appears to identify a hybrid arrangement, where a longer link road option is presented, but that it is treated to provide priority to bus movements, therefore discouraging it from providing any strategic function, evident below.

[see image 4]

The strategy for the Northern Link Road is, therefore, at this stage, unclear. There does not appear to be a confirmed approach as to whether it is something that would be provided, the form it would take, and crucially if it is indeed essential to support the growth aspirations within the Local Plan.

This is particularly relevant for the North Hemel Hempstead draft allocation as it will align through that site, encouraging traffic to use this route to access the M1 Junction 8 without being overly reliant on the A414 and/or placing additional pressures on the local road network to the south of the site.

Additionally, the Northern Link Route option detailed in The Paper and within the Additional Allocation COMET scenario, aligns the link road through part of North Hemel Hempstead that is in fact not being promoted as a housing site that will be delivered within this Local Plan period. The Local Plan identifies that part of North Hemel Hempstead will be released from Green Belt within this period, but will not be developed until after 2038, referred to as Phase 2. There is, therefore, a question mark as to whether the link road would/could be delivered within this plan period given its alignment is through a wider site that will not be developed within this period. The Figure below identifies the Phase 2 North Hemel Hempstead site (pink) and the indicative alignment of the Northern Link Road through it (green).

[see image 5]

Also relevant to this concern is the reliance on the delivery of this Northern Link Road alignment through the adjacent St Albans District Council. Given this adjacent authority have relatively recently withdrawn their Local Plan, there are further concerns about the deliverability of the link road and spine road through Maylands.

There are other parts of the COMET report, referenced within The Paper, that also suggest the wider strategy is unclear. Across all parts of the transport related evidence, reference is given to the A414 becoming a sustainable travel corridor, with bus priority, dedicated bus lanes and, in places, the transfer of existing traffic lanes to accommodate this bus infrastructure. The COMET report states that within the scenarios tested, the A414 remains as a dual carriageway, acknowledging that should it be reduced to one traffic lane this would place additional stress on parallel east-west routes. Given the intention for the A414 will likely result in the loss of capacity along this route for through traffic, the modelling analysis should include scenarios where the capacity of the A414 is reduced, which in turn may further increase the necessity for the Northern Link Road to support development within this area.

The COMET report acknowledges that the analysis undertaken is indicative and is in order to give a general picture of potential capacity constraints as a result of the allocations. Site specific development proposals would need to be assessed at a more detailed local level using junction modelling software to understand the true impact of any proposal. The report also acknowledges that trip generation assumptions for individual allocations that have been adopted within the analysis are likely to be lower than what may be submitted as part of a planning application. This is evident in Figure 5.25, which seems to suggest that the Hemel Hempstead North (2000 units) allocation would generate 170 exit movements in the AM peak and 144 entry movements in the PM peak, with two-way flows being 203 in the AM peak and 209 in the PM peak.

Whilst it is appreciated that the site will promote a range of interventions to support and encourage sustainable travel, these trips assumptions are very low for this scale of development and some clarification on this is required. To demonstrate this, using a standard TRICS based approach to generate residential trip rates, it would not be unreasonable to apply rates of, around, 0.5 two way trips per unit, in each of the AM and PM peak, as was adopted within a Transport Assessment submitted in support of the West Hemel Hempstead planning application. Applying these trip rates to the draft allocation of 1,500 units results in peak hour trip generation totalling 750 vehicle movements, nearly 4 times higher than has been

assumed in the COMET modelling analysis. As such, there are additional queries as to the requirement for the Northern Link Road in this area should trip generation from the allocation have been underestimated.

Similar comments are made with regards to testing of development aspirations within Berkhamsted and Tring. For a site, Land East of Berkhamsted, the COMET analysis generated two way AM peak movements of 163 vehicles for a development proposal of 2000 units. Again, whilst the implementation of various measures will encourage active travel and bus use, the vehicular trip rates are considered to be very low. The Berkhamsted and Tring Sustainable Transport Study concludes that COMET outputs have been used to inform the adopted transport interventions, which seek to avoid new road links and junctions, stating that the COMET models do not indicate that there is a requirement for large scale interventions. If the COMET modelling is underestimating trip generation across Tring and Berkhamsted, then the strategy to focus purely on active modes improvements without some consideration of highway capacity may generate some concerns with existing residents.

Infrastructure Funding

The evidence base is supported by a Draft Infrastructure Delivery Plan (November (2020))IDP, which seeks to set out infrastructure required to support the delivery of the Local Plan. It is acknowledged that the IDP will continue to evolve to inform Local Plan revisions, with subsequent revisions to include prioritisation, cost apportionment, timing and phasing.

Table 41(a) of the IDP identifies a range of highways and transport related interventions necessary to support the growth aspirations, which range from £180 million to £270 million. This list excludes the Northern Link Road through the draft allocations and the spine road to Maylands, which we assume is due to the developments being obligated to provide this.

Appendix B of the IDP then identifies apportionment, developer contributions and other funding source assumptions in relation to each of these schemes. However, for each highway proposal, funding sources are identified as 'To Be Confirmed,' whereas each other type of infrastructure (schooling/green infrastructure / health infrastructure etc) each have capital costs and assignment identified.

There is a concern therefore that none of the highway interventions have any funding assigned to them and, due to their scale, be reliant on a large proportion being funded by Government or other sources such as Local Enterprise Partnerships, which could potentially result in some interventions being prioritised over others and therefore ultimately not delivered.

Given the cumulative impact of development aspirations for North and East Hemel Hempstead is reliant on a range of different types of interventions, many of which are costly, there are queries over their deliverability.

The same concerns are raised with regards to the transport interventions necessary to support the development aspirations within Berkhamsted and Tring, each of which is also unconfirmed.

Transport related comments on the emerging Local Plan can therefore be summarised as follows:

- Consultation on the Local Plan is being invited without the full evidence base having been shared, primarily the Hemel Hempstead Sustainable Transport Strategy, which will identify interventions at the site wide level and settlement wide. Given the interrelationship between the site allocation and transport mitigations it is essential these are reviewed in tandem.

- The strategy is unclear in terms of the form, requirement and deliverability of the Northern Link Road. It's full delivery is reliant on sites that will not come forward within this Local Plan period and the adjacent local planning authority that has recently withdrawn its Local Plan. Should the North Hemel Hempstead site be reliant on its delivery then the allocation is potentially at risk.
- The transport interventions have been informed by COMET modelling that are based on assumptions that are potentially a concern, with very low levels of vehicular trip generation and no allowance for reductions in capacity on the A414 that may occur via the delivery of the sustainable travel corridor.
- There are concerns regarding the lack of funding of the various transport interventions that have been identified. Where the cumulative impact of development within the North Hemel Hempstead area requires costly interventions to be delivered, such as the Northern Link Road, then a lack of infrastructure funding raises questions as to the whether they are acceptable sites for allocation/safeguarding within the draft Local Plan.

Included files	image 4.jpg (1) image 5.jpg
Title	Question: Evidence Base
ID	EGS15085
Person ID	1261425
Full Name	Camilla Pascucci
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>1 The DLP Sustainable Transport Study does not show current volumes of traffic flow, and then that projected at the end of the Local Plan, arising from the proposed new homes/population growth. Therefore, the Draft Local Plan does not define the social impact of the proposed growth in the town and the reduction in the quality of life to the existing citizens.</p> <p>On further inspection its facts/figures/evaluations do not use consistent base markers for data/statistics and does not clearly state the source/date/nature of the information. An example is Berkhamsted, the DLP has statements where the population data sometimes is Berkhamsted only, sometimes includes Northchurch, sometimes 2011 census and sometimes 2015/2017/2019. There is no clear base figure that is being worked to, so it is not easy to understand the potential impact.</p>

Included files	
Title	Question: Evidence Base
ID	EGS15108
Person ID	1270925
Full Name	Mrs Kathryn Salway
Organisation Details	Extinction Rebellion Dacorum
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:</p> <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan <ul style="list-style-type: none"> • Final version of Strategic Design Guide SPD - as this specifies details and the criteria for the Sustainability Statements to guide developers
Included files	
Title	Question: Evidence Base
ID	EGS15123
Person ID	1222814
Full Name	Alex MacGregor
Organisation Details	Senior Planner Quod Ltd (ON BEHALF OF PIGEON INV MAN LTD)
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<p>Pigeon Hemel Hempstead Ltd welcomes that DBC has identified infrastructure requirements for strategic locations within Appendix B of the Infrastructure Deliver Plan (IDP) (November 2020).</p> <p>Pigeon Hemel Hempstead Ltd note that the IDP is an evolving document, and therefore, in the next version of the IDP, Pigeon Hemel Hempstead Ltd recommends that further detail is added to the IDP to ensure that the Plan is found sound. At present, the IDP does not include funding mechanisms for some of the infrastructure interventions required to deliver the North and East of Hemel Hempstead Growth Areas. Deliverability needs to be a key focus of the ongoing work in connection with HGC.</p> <p>It will be important that the necessary level of detail is developed as part of the HGC Framework Plan, which will provide a spatial framework and infrastructure provision for North and East of Hemel Hempstead Growth Areas. The HGC Framework Plan is being prepared by The Crown Estate, Bloor, Pigeon and Kitewood, HGC Programme Team, DBC, SADC and Hertfordshire County Council (HCC)).</p> <p>The HGC Framework Plan will include the preparation of an Infrastructure Framework that will identify phasing & funding sources for infrastructure (e.g. S106, CIL, external funding bodies, development cost). This will therefore be an important part of the evidence base in demonstrating the deliverability and soundness of the HGC Growth Area allocations and DBC should work towards and utilise this level of detail for all infrastructure interventions in the next version of the IDP to demonstrate that the infrastructure (and the Plan) is deliverable.</p>
Included files	
Title	Question: Evidence Base
ID	EGS15159
Person ID	1270945
Full Name	
Organisation Details	NORTHCHURCH PARISH COUNCIL
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS15160
Person ID	1270945
Full Name	
Organisation Details	NORTHCHURCH PARISH COUNCIL
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>Dacorum's target of 922 dwellings is based on out-of-date projections carried out in 2014. Subsequent household projections in 2016 and 2018, by the Office for National Statistics (ONS), have been much lower, with significant declines in London, the South East, and the East of England. For example, in 2014 the ONS projected growth, over 25 years, at 23.1%. In 2016 this projection fell to 17.3%, and in 2018 it fell to 16.2%. Within these projections, increases in the East Midlands, North East, North West, and South West were balanced by significant declines in London, the South East, and the East of England.</p> <p>In Dacorum, the reduced projections led to a fall in the annual requirement for dwellings from 922 in 2014 to 430 in 2018. The trend for working from home rather than commuting to an office, has further reduced the demand for dwellings near train stations within commuting range of London. Future projections for housing requirements in Dacorum are likely to be even lower. So, Dacorum's Local Plan is based on projections that are out of date and that do not reflect current demand.</p> <p>Other planning authorities have declined to use these outdated projections. For example, in October 2020, Buckinghamshire Councillors voted to withdraw their Local Plan and are working on a revised plan to "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law". Dacorum's</p>

councillors should follow the example of their Buckinghamshire counterparts, withdraw their Local Plan, and produce a new plan based on current projections.

Included files

Title Question: Evidence Base

ID EGS15177

Person ID 1270993

Full Name MRS MERRIL TRUEMAN

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

No

QUESTION: Evidence Base comment

I consider the council ' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council ' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.

This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS15187

Person ID 1270998

Full Name	PAUL HARRIS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council ' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council ' s assessment of Green Belt land within the Borough identifies</p> <p>substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS15198
Person ID	1142578
Full Name	Mr Norman Brooks
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrarily done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS15219
Person ID	1264623
Full Name	Judy Chaussalet
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:</p> <ul style="list-style-type: none"> • Climate Change and Sustainability SPD, • Detailed Design Guide SPD • Climate Change Strategy and Action Plan

- Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers

Included files

Title Question: Evidence Base

ID EGS15220

Person ID 1271003

Full Name Thierry Chaussalet

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment The consultation period should be extended to allow the documentation that is either in draft or not delivered to be published:

- Climate Change and Sustainability SPD,
- Detailed Design Guide SPD
- Climate Change Strategy and Action Plan
- Final version of Strategic Design Guide SPD- as this specifies details and the criteria for the Sustainability Statements to guide developers

Included files

Title Question: Evidence Base

ID EGS15227

Person ID 1271006

Full Name Ms Zoe Wiggins

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	This is a 25% increase over the current housing stock. These Central Government imposed growth figures are not substantiated by evidence and are based upon outdated ONS projections. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% fewer than this plan projects - and falling birth rates and the decline in immigration following Brexit will no doubt continue to decrease this projection.
Included files	
Title	Question: Evidence Base
ID	EGS15251
Person ID	1271086
Full Name	MRS PATRICIA BEL-BARKO
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their _allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>

Included files	
Title	Question: Evidence Base
ID	EGS15299
Person ID	1161497
Full Name	Mr Robert Sellwood
Organisation Details	The Crown Estate
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p><u>The Evidence Base</u></p> <p>The evidence base is sufficient to support the Regulation 18 consultation but will need extensive augmenting to support the Regulation 19 consultation later in 2021. Particular parts of the evidence base needing further work are :</p> <ul style="list-style-type: none"> • the transport modelling / proposed infrastructure in Hemel Hempstead • greater detail on the viability and deliverability of individual allocations • the justification for two new Secondary Schools to serve around 5,500 homes in the two phases of the North Hemel Growth Area • the justification for the location of a Council Depot and household waste recycling centre within Phase 1 of the North Hemel Growth Area to serve the whole of Hemel Hempstead.
Included files	
Title	Question: Evidence Base
ID	EGS15304
Person ID	1250151
Full Name	Andrew Marsh
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	<p>SUMMARY</p> <p>Whilst we consider many aspects of the plan to be sound we have identified issues with some of the policies and site allocations which do compromise the overall soundness of the plan. Under paragraph 35 of the National Planning Policy Framework ('The Framework') some aspects of this Plan are unsound as they're not justified, effective, or consistent with national policy. We have identified in detail below where we find the Plan unsound and what measures are needed to make the Plan sound. We hope that you find the following comments helpful.</p> <p><u>Evidence Base for Growth Areas</u></p> <p>The identification of potential sites for development within a Local Plan is an important step in establishing where change and growth will happen across a local authority area, as well as the type of development and when it should occur. It is important that the sites that are selected as allocations are based on an understanding of their potential impact upon the historic environment. A number of the Council's proposed sites have the potential to impact on heritage assets.</p> <p>In order to help refine which growth allocations to take forward, we would suggest that a Heritage Impact Assessment (HIA) is undertaken of each of the sites identified in the following section. We would refer you to our Advice Note 3 'The Historic Environment and Site Allocations in Local Plans.</p> <p>All sites discussed below will need to be appraised against potential historic environment impacts. It is imperative to have this robust evidence base in place to ensure the soundness of the Plan. We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or intervisibility with, a potential site. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable. Cumulative effects of site options on the historic environment should be considered too.</p> <p>The following broad steps might be of assistance in terms of assessing sites:</p> <ul style="list-style-type: none"> • Identify the heritage assets on or within the vicinity of the potential site allocation at an appropriate scale;

- Assess the contribution of the site to the significance of heritage assets on or within its vicinity;
- Identify the potential impacts of development upon the significance of heritage asset;
- Consider how any harm might be removed or reduced, including reasonable alternatives sites;
- Consider how any enhancements could be achieved and maximised; and
- Consider and set out the public benefits where harm cannot be removed or reduced

The HIAs should assess the suitability of each area for development and the impact on the historic environment. Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and a strategy diagram which expresses the development criteria in diagrammatic form.

Included files	
Title	Question: Evidence Base
ID	EGS15330
Person ID	1271128
Full Name	Little Gaddesden Parish Council c/o Cllr John Saner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION: Evidence Base comment	For reasons already stated elsewhere in this submission, we believe the assumptions on which the proposals are based are flawed
Included files	
Title	Question: Evidence Base
ID	EGS15349
Person ID	1271220
Full Name	MAUREEN RUMSEY
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council ' s Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council ' s assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and</p> <p>yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS15386
Person ID	1248890
Full Name	Mr Stuart Oldroyd
Organisation Details	Whiteacre Ltd
Agent ID	1270853
Agent Full Name	Jon Goodall
Agent Organisation	DLP Planning Limited
Yes / No * Yes	

QUESTION: Evidence Base comment

This section of the representations Report considers the Council’s evidence base in terms of the wider site selection process in relation to the assessment of the proposed allocation at Grange Farm and the assessment of reasonable alternatives. Taken together, the representations seek to reinforce the proposed allocation at Grange Farm as essential to deliver a sound Local Plan and strategy for Bovingdon that is effective, justified and positively prepared.

The Site Selection Process

This section of the representations considers the Council’s site selection process, including the outputs of the Council’s Site Selection Topic Paper and related findings within the evidence base, including the Sustainability Appraisal. These representations support the overall conclusion at Table 17 of the Site Selection Topic Paper regarding ‘Key Developments in Bovingdon’, which identifies proposed allocation Bv01: Grange Farm.

Notwithstanding this, the explanatory text in paragraphs 6.19 and 6.20 of the Background Paper does not, we argue, fully reflect the potential for exceptional circumstances to be demonstrated for the amendment of Green Belt boundaries at Grange Paragraph 6.19 in-particular effectively limits justification for the smaller-scale of growth selected to the conclusion of ‘constrained’ limits to development at the settlement.

Presentation of the findings following site selection in this context is not consistent with the Council’s own explanation of how recommendations were reached at paragraphs 8 to 6.10 of the Topic Paper.

This includes considering the potential for settlements to “**deliver new infrastructure to serve existing and future communities**” and “**accelerate housing delivery**” consistent with the timely delivery of requirements to accommodate future growth and maximise opportunities for sustainable transport. All of these aims are demonstrably satisfied by the proposed allocation at Grange Farm.

Presenting the outcomes of the site-selection process for specific options on the same basis is necessary to ensure consistency with national policy and guidance for plan-making. The PPG states:

*“Authorities preparing local plans should **assess future needs and opportunities** for their area, explore **and identify options for addressing these**, and then set out a preferred approach” (ID: 61-034-20190315) (our emphasis).*

By extension, this means that the Council’s conclusions should be reinforced to fully demonstrate that the allocation of Grange Farm is required to achieve a sound Plan as part of Bovingdon’s contribution to a wider spatial strategy that is positively prepared, effective and deliverable.

The commentary at Appendix B of the Site Selection Topic Paper (which addresses the Council’s summary and recommendations for allocation) provides a more comprehensive basis to assess the proposed strategy for Bovingdon, as part of standalone conclusions for the Grange Farm site:

*“**Officer Recommendation for New Local Plan:** Site is proposed for an allocation of around 150 dwellings with public open space, and sufficient land should be safeguarded for a new three form-entry primary school.*

Site performs well on a number of identified constraints, many of which are likely to be sufficiently mitigated through development. Development of the site would assist in the delivery of new drainage infrastructure that would address

known surface water flooding issues for existing communities in the area. This will be implemented as part of a new public park which to serve the wider village. Having regard to the above and other alternative sites in Bovingdon, on balance officers consider that Grange Farm is the most sustainable option, bringing a number of benefits for Bovingdon as well as meeting the wider strategy of the Local Plan. Officers therefore recommend its allocation in the new Local Plan.”

For the avoidance of doubt it is the position of these representations that any identified constraints can be sufficiently mitigated to support the Council’s reasons for site selection and conclusions regarding the potential for exceptional circumstances to be demonstrated.

It is also clear that the Officer recommendation and summary need to be read together to ensure that the Council’s reasons for selecting the proposed allocation at Grange Farm fully align with the proposed Delivery Strategy for Bovingdon. It is our contention that the Council’s site-specific reasons nonetheless do not yet recognise all components of the strategy towards which Grange Farm contributes.

This notably relates to paragraphs 23.192 to 23.194 of the supporting text of the Emerging Strategy for Growth, which these representations support in terms of the role of the Grange Farm in enabling potential regeneration of the High Street.

The draft Local Plan confirms that the potential relocation of Bovingdon Primary Academy School is central to a variety of objectives (including highways, open space and community facilities components) that have been subject to engagement with the Parish Council and County Council.

Selection of the proposed allocation at Grange Farm is a prerequisite to achieving these potential benefits of sustainable development given that it is the only potential option assessed via the site selection process as demonstrating the ability and willingness to safeguard land for a new school.

Comparison of Assessment Findings – Proposed Grange Farm Allocation

When the evidence for Grange Farm is considered against other reasonable alternatives assessed as part of the site selection process it is clear that reinforcing and supplementing the Council’s reasons for site selection would be justified.

The starting point for this is the Council’s Sustainability Appraisal of proposed Policy SP27 regarding the Delivery Strategy for Bovingdon. This identifies no potential significant adverse effects against the Plan’s objectives.

Section 6.2 of the main SA Report states that the assessment of policies has been undertaken without regard to potential mitigation or enhancement measures. However, the assessment findings for each settlement are clearly contingent on the outcomes of site selection. For Bovingdon this is identified by the findings under objectives 10, 11, 12, 14 and 15; each of which can only be achieved as a result of the proposed allocations and delivery of site Bv01: Grange Farm.

Table 3 below compares the assessment findings against the Sustainability Appraisal objectives for Policy SP27 (Bovingdon Delivery Strategy) and Site Bv01: Grange Farm.

Read together with paragraphs 6.19 and 6.20 of the Site Selection Topic Paper, it is clear that the Council’s reasons for setting out the selected strategy for Bovingdon should go significantly further to recognise that the potential benefits for

sustainable development could not be achieved without supporting the minimum level of growth proposed and would specifically not be achieved without support for the proposed allocation at Grange Farm.

It is noted that the Sustainability Appraisal Report does not provide a clear definition of the reasons that the assessment of effects may be associated with significant positive outcomes. No criteria are given to clearly indicate the circumstances in which this outcome may be identified. It is apparent from Table 6.1 of the Main Report that no significant positive effects are identified in the Delivery Strategy for any of the Large Villages at Bovingdon, Markyate or Kings Langley.

However, the potential Delivery Strategy for Bovingdon can be clearly distinguished on the basis that the selected strategy, including the proposed allocation of Grange Farm, incorporates a number of benefits to the wider community including safeguarding land to meet future requirements for growth and enable regeneration of the High Street, which is not the case at either Markyate or Kings Langley. There are other examples in the Sustainability Appraisal where the provision of additional mixed-use employment floorspace is accorded the potential for **significant positive effects**. It is considered that where the Delivery Strategy, contingent on allocation of the Grange Farm site, supports similar objectives in relation to **community cohesion (objective 12)** and **sustainable prosperity (objective 14)** the assessment findings should be revisited to recognise the potential of substantial benefits to sustainable development.

The ongoing contributions of the proposed Grange Farm allocation to sustaining and enhancing opportunities for economic development include, but are not limited to, retention of existing employment uses on site and new employment-generating associated with the delivery of specialist elderly housing and relocation and expansion of the Primary School.

Table 3: Comparison of Sustainability Appraisal Findings – Proposed Grange Farm Allocation

Sustainability Appraisal Objective

Assessment of Policy SP27: Delivering Growth in Bovingdon

Assessment of Site Bv01: Grange Farm

DLP Notes

Biodiversity

Uncertain

Adverse

Assessment of the Delivery Strategy notes that selection of the proposed Grange Farm allocation will not result in significant adverse effects for biodiversity. It is confirmed that

new TPOs within the site would be retained as part of any future development together with retention and enhancement of boundary planting.

Water

No predicted effects

Uncertain

See below.

Flood Risk

No predicted effects

Uncertain

SA of site BV01 notes proposals include delivering alleviation measures which could deliver wider benefits for existing residents and wider village.

Both assessments should be reassigned Positive Effects.

Climate Change

No predicted effects

Positive

SA of site BV01 recognises accessible location with potential to decrease the need to travel by car, reduce growth in airborne emissions and provide additional benefits associated with increased walking and cycling, including positive impacts on high street pollution and congestion.

Delivery Strategy assessment should be reassigned Positive Effects

Air Quality

No predicted effects

Positive

SA of site BV01 recognises accessible location with potential to decrease the need to travel by car and provide additional benefits associated with increased walking and cycling and would have positive impacts on congestion within the High Street.

Delivery Strategy assessment should be reassigned Positive Effects.

Soils

Adverse

Significant Adverse

SA of the Delivery Strategy notes that the bulk of planned growth will be met on greenfield sites, with potential to ensure that loss of Grade 2 soils is minimised e.g. sealing open space

See Section 5.5 of the main SA Report ('Council's reasoning for the preferred strategy'). This notes that much of the land south, west and east of the settlement comprises Grade 2 agricultural land but recognises that the Grange Farm sites provides additional

sustainability benefits including flood alleviation and additional open space Assessment of Site Effects should be reduced to Adverse/Uncertain

Resource Efficiency

No predicted effects

Uncertain

Site is located within the Brick Clay Mineral Safeguarding Area.

Historic Environment

No predicted effects

Uncertain

The Site Selection Topic Paper notes, in relation to White Hart Cottage (Grade II Listed) in proximity to NW corner of the site:

“The retention of [these] trees and possible further landscaping should ensure the setting of the listed building is respected and maintained.”

Assessment of Site Effects should be reduced to No Predicted Effects

Landscape/Townscape

Adverse

Adverse

See LDA Design Report (November 2020), which concludes that the landscape sensitivity of parcel BV-A6 should be rated as Low. It is considered, following the findings of the Stage 3 Green Belt Review, that amendment of Green Belt boundaries west of the settlement would compare more favourably than other site options given the self-containment of the site and scope to provide clearly identifiable and defensible alternative Green Belt boundaries.

Both assessments should be reassigned Uncertain or No Predicted Effects

Health and Wellbeing

Positive

Positive

Both assessments recognise improved walking and cycling links, sustainable location and delivery of new open space

Sustainable Location

Positive

Positive

SA of Delivery Strategy refers to additional benefits of potential High Street Regeneration

Community Cohesion

Positive

Positive

Both assessments recognise benefits of provision of land for a new school. Both assessments should be reassigned Significant Positive Effects

Housing

Positive

Positive

SA of site BV01 assess potential effects based on a capacity of 250 homes.

SA of site also notes potential additional benefit through provision of specialist elderly housing

Sustainable Prosperity

Positive

Positive

Assessment of Delivery Strategy notes that this includes provision to maintain the shopping and service role of the village with additional employment opportunities from enabling new development at the High Street and from the proposed nursing home.

Both assessments should be reassigned Significant Positive Effects

Employment and Skills

Positive

Positive

Assessment of the Delivery Strategy notes the development of a new 3FE Primary School together with enabling development at the High Street would further local objectives for job creation.

It should also be noted that the indicative Grange Farm Masterplan proposals enable retention of existing commercial uses within the site.

Both assessments should be reassigned Significant Positive Effects

There are, however, apparent inconsistencies between the assessment of policies and sites in the Sustainability Appraisal. Specifically, the assessment of policy SP27 records no strategy-specific predicted effects for objectives 2 to This is despite the specific assessment for the Grange Fam having identified positive effects for climate change and air quality due to the accessible location of the site, proximity to the village centre and delivery of new local facilities with enhanced walking and cycling links.

The site-specific assessment also notes 'uncertain' potential effects in relation to Flood Risk. However, for the reasons given in the SA, supported by these representations it is considered that this objective should be assigned at least a positive classification. This is because the proposals include delivering alleviation measures which could deliver wider benefits for existing residents. These improvements have been incorporated at all stage of preparing indicative masterplan proposals for the site and are capable of being secured via appropriately worded policy criteria for site BV01. They have also been scrutinised by HCC drainage experts and found acceptable.

Importantly, the Sustainability Appraisal should also recognise the implications of the 'do nothing' scenario at Bovingdon which would identify potential negative effects as a result of not addressing existing surface water drainage issues affecting the wider settlement. The same potential negative effects would also arise if the proposed strategy was altered to select any of the other alternatives in the settlement considered as part of the site selection process, as they cannot intercept and disperse the floodwater flows, owing to their location at the opposite side of the village

Site Assessment Findings for Grange Farm and Reasonable Alternatives

The Site Selection Topic Paper also sets out reasons provided by Officers not to support the proposed allocation of other reasonable alternatives considered as part of the site selection process. The Topic Paper confirms that these reasons take account of the findings within the wider evidence base. For the avoidance of doubt these representations support the overall basis for reasons presented under the detailed assessments for each alternative site in Bovingdon at Appendix B of the Site Selection Topic Paper.

Table 4 provides an overview and evaluation of findings for each of the six greenfield sites in Bovingdon (excluding Bovingdon Airfield) carried forward for detailed assessment (as identified at A15 of Appendix A to the Site Selection Topic Paper). The purpose of the Table is to demonstrate that, even when the potential requirements of the overall Delivery Strategy are treated separately, the proposed Grange Farm allocation performs favourably at a site-specific level when compared with the other alternatives assessed.

Table 4 also takes account of Appendix F of the Council's Sustainability Appraisal, which provides a useful starting point in setting out specific reasons for the non-inclusion of sites in the draft Local Plan following detailed assessment.

In terms of the site assessment process and the evaluation of potential outcomes for site- selection we would also note reservations regarding the comparative level of information available to support the site options assessed. Specifically, the DBC Site Assessment appears to provide an assessment of the capacity for development based on gross and net site areas only, to calculate total potential residential capacities within the net developable. The AECOM assessed capacity of Grange Farm for 252 units is an illustration of this.

Importantly, the site-selection findings for Grange Farm reflect its proposed allocation for development, to provide for a moderated total of 150 dwellings (no longer 252 dwellings) together with the other requirements of the Delivery Strategy. Moreover, the Grange Farm site has previously been subject to extensive pre-application discussions demonstrating that the site is unconstrained by any relevant legal or technical constraints to development in terms of (for example) access, highways and drainage.

The context is substantially different for the other options assessed - potential legal and technical constraints to development may further affect the feasibility of development and comprise a material consideration, should any further detailed testing be required. The following points are highlighted:

- No detailed testing of highways matters is referred to in the assessment for Site Refs 39 (Homefield) and 34 (Fox Meadow), notwithstanding the noted highway safety. The site assessment process does not contemplate the likely implications for development potential associated with available highway capacity. This includes acceptable outcomes for components such as sight lines, junction design, non-residential traffic volumes (e.g., Bovingdon Football Club) and vehicle speeds at this part of the highways network as referred to in the assessment findings. No evidence is presented to support the assessed combined site capacity of 136 units.
- The site assessment findings for Site Refs 39 (Homefield) and 34 (Fox Meadow) refer only to the technical feasibility of access. No consideration appears to have been given to and land ownership of legal restrictions including the potential for restrictive covenants to affect access options.
- The site assessment findings are not sufficiently detailed to identify likely impacts on development potential for site options that would require substantial mitigation in terms of their shape and internal layout. The assessment of Site Ref 33 (Duckhall Farm) notes the irregular shape and separation into two narrow arable fields. In practice the mature tree belt dividing these parcels would require extensive root protection measures and further assessment of the impact on Listed Buildings and their. The internal configuration is likely to be a factor behind previous options identifying a substantially lower capacity on only part of the site area.

Table 4: Comparison of Site Selection Key Findings for Reasonable Alternatives at Bovingdon

Topic Paper Site Reference

Green Belt Parcel

Green Belt Harm Conclusions

Site Assessment Conclusions

Sustainability Assessment Conclusions

DLP Observations – Site Selection Topic Paper Conclusions and Delivery Strategy Considerations

35 – Grange

BV-A6

Sub-area would not

252 Units

See Section 5.5 – Council’s selected

The site is of a scale that could deliver

Farm (Bv01)

compromise the
Presence of existing
strategy:
additional community facilities for

ability of the wider
screening likely to reduce
At Bovingdon, much of the land to
Bovingdon, including a new primary

Green Belt to meets
potential impact on setting of
the west, south and east of the
school to meet existing and future needs,

its purposes –
relevant designated heritage
settlement is classified as Grade 2,
however it would impact upon the amount

consider the whole
assets.
and Grange Farm offers more
of housing that the site could deliver.

sub-area further.

Susceptibility to Surface

sustainability benefits in terms of

The potential to consider readily

Water Flood Risk identified.

flood alleviation for the village. The

identifiable, clearly defined and

Minor landscape constraints

Council considers that an allocation

defensible amended Green Belt

identified given existing

of 150 dwellings at Grange Farm will

boundaries is considered for the whole

mature vegetation and

allow for significantly more open

sub-parcel - Development at the site

relationship with settlement
space to be provided, therefore
would go beyond the existing hedgerows

edge
reducing the amount of soil sealing
used as defensible boundaries, but a new

Scale would not be
within the site.
one would be created by the road on the

disproportionate (at 252 units)

south-western boundary.

While the Council's conclusions for the

reasons to select the preferred strategy

refer to the reduced capacity of 150

dwellings the findings under other site

assessment criteria have not been

revisited.

39 - Homefield

D-SS2 (small-

Sub-area would not

112 units

Issues currently exist with on-street

Site Selection Topic Paper notes that the

scale sub-

compromise the

Susceptibility to Surface

parking which give rise to highway

site is of a scale that could deliver

area)

ability of the wider

Water Flood Risk identified.

safety issues notwithstanding

additional community facilities for

Green Belt to meets

Proximity of Listed Buildings

technically feasible access onto

Bovingdon, including a new primary

its purposes –

on Chipperfield Road and
Green Lane. It is unclear how this
school to meet existing and future needs,

consider the whole
proximity of area of
could be effectively managed to
however it would impact upon the amount

sub-area further.
archaeological significance
ensure appropriate sight lines are
of housing that the site could deliver.

noted
achieved in addition to enhancing
The Green Belt harm conclusions

Potentially suitable but with
traffic flows at peak periods.
identified in the Site Assessment process

minor constraints

are drawn from the tightly defined sub-

area, which could be sensitive to the

existing nucleated pattern of the village

and utilise natural field/hedgerows as

amended Green Belt boundaries.

The site selection process does not

consider the potential implications of

amended site boundaries associated

with providing land for community

facilities including new 3FE Primary

School and impact of congestion on the

High Street.

34 –

Fox

BV-A5

Weak contribution

24 Units

Issues currently exist with on-street

Site Selection Topic Paper recognises

Meadow

to GB purposes

Susceptibility to Surface

parking which give rise to highway

that the site is of a scale that is unlikely to

(site occupies
Water Flood Risk identified.
safety issues notwithstanding
deliver significant new community

smaller part of wider
Not directly accessible from
technically feasible access onto
services and facilities directly, although it

parcel)
the highway network – access
Green Lane. It is unclear how this
can provide public open space.

(sub-area
assumed via Site 39 of Louise
could be effectively managed to
Potentially adverse impact on the

recommended to

Walk

ensure appropriate sight lines are
highway network at peak times, when

avoid potential

Restriction of site area

achieved in addition to enhancing
compared to alternatives.

impact on wider

proposed to avoid extension
traffic flows at peak periods.

Site Assessment does not identify the

Green Belt to meet

into open countryside with

potential to identify clearly defined and

its purposes)

undeveloped land on three of

defensible

alternative

Green

Belt

four sides

boundaries. This site does not possess

the infrastructure requirements within the

IDP.

41 – Land

BV-A3

Strong contribution

25 Units

Impact on Conservation Area noted

Site Selection Topic Paper recognises

North of

to GB purposes

Site makes existing

that the site is of a scale that is unlikely to
Vicarage Lane

(site occupies
contribution to Green Belt

deliver significant new community

smaller part of wider
purposes, is adjacent to the

services and facilities directly, although it

parcel)

Conservation Area and

can provide public open space.

performs poorly on transport-

Potential impact on setting of Bovingdon

but is within walking distance

Conservation Area identified

of High Street services and

Site Assessment does not identify the

facilities if access can be

potential to identify clearly defined and

secured, subject to achieving

defensible

alternative

Green

Belt

contiguous

boundary

with

boundaries which would have a

existing built-up area -

significant detrimental impact.

potentially suitable with major

No reference to potential to support

constraints

future relocation of Bovingdon Primary

Academy

42 – Land

BV-A3

Strong contribution

25 units

Site Selection Topic Paper recognises
South of

to GB purposes

Site performs very poorly in
that the site is of a scale that is unlikely to
Hampstead

(site occupies
Green Belt terms but small
deliver significant new community
Road

smaller part of wider
scale of site improves its
services and facilities directly, although it

parcel)
performance on a range of
can provide public open space.

other criteria, subject to
Potential impact on setting of Bovington

achieving contiguous
Conservation Area identified

boundary with existing built-
Site Assessment does not identify the

up area - potentially suitable
potential to identify clearly defined and

with major constraints
defensible alternative Green Belt

boundaries

No reference to potential to support

future relocation of Bovingdon Primary

Academy

33 – Duckhall

BV-A2

Moderate

72 Units

Potential adverse effects for

Site Selection Topic Paper recognises

Farm

contribution to GB

Site performs very poorly in

community cohesion (proximity of

that the site is of a scale that is unlikely to

purposes

Green Belt terms and has

HMP The Mount)

deliver significant new community

(site occupies
significant heritage

services and facilities directly, although it

smaller part of wider
constraints at its southern end

can provide public open space.

parcel)
– potentially suitable with

Numerous heritage assets in close

major constraints

proximity including Honours Farm with

open views into the site

No reference to potential provision of

community

infrastructure

(including

potential relocation of school) which

would be expected to significantly reduce

potential capacity for residential

development or increase identified

adverse impacts.

These representations express some concern that the presentation of conclusions does not necessarily take account of a wider view on the potential for exceptional circumstances to be demonstrated, in terms of the consequences for sustainable development, should any alternative locations for growth be supported.

To a significant extent these observations reflect the Council's assessment of the proposed Delivery Strategy at Bovingdon, which clearly reflects that support for the Grange Farm site is a prerequisite for delivery of the wider benefits identified. The Grange Farm site would remain necessary to deliver those wider benefits even if a higher overall level of development in Bovingdon was supported as part of the selected spatial distribution option. It is important to assess whether this conclusion is consistently reflected across the Council's evidence base.

These representations also consider the extent to which the specific findings of the Council's evidence base support an objective and comparative assessment of individual sites. This is important in order to ensure that conclusions on standalone criteria such as the potential level of Green Belt harm can be properly taken into account, when weighing the potential for exceptional circumstances to be demonstrated on any individual site; together with recognising how the Council's assessment of wider strategy options informs the selected approach in terms of overall levels of growth.

It is clear from the findings of Table 4 that the site-specific outcomes of the assessment process cannot be readily separated from the overall requirements of sustainable growth and the Delivery Strategy for Bovingdon. The Council's Site Selection Topic Paper (Appendix B) places significant weight on the potential provision for new public/community facilities. This element of the weighting exercise on the potential for exceptional circumstances to be demonstrated is fully supported.

Rejection of Reasonable Alternatives Identified with Major Constraints (Sites 33, 34, 41 and 42)

Notwithstanding the total number of six sites taken forward, only two of the identified options (Site Bv01: Grange Farm and Site 39: Homefield) do not have major identified constraints to development. In each of these instances the site options with major constraints are also not considered candidates for delivery of new community infrastructure. These options cannot be considered reasonable alternatives for the purpose of achieving the requirements of the Delivery Strategy identified, without which growth in Bovingdon would not be sustainable or sound.

The observations in Table 4 also demonstrate that significant weight needs to be accorded to the identified site constraints, both individually and cumulatively. Sites 33, 34, 41 and 42, even if considered together, would achieve a lower quantum of development than can be appropriately and sustainably accommodated at the proposed Grange Farm allocation with a quantum of 150 homes. The potential constraints to these alternative site options are more significant than identified at Grange Farm, with limited identified opportunities for mitigation.

Irrespective of the detailed assessment undertaken in the Council's evidence base, these representations conclude that there is no justification to support the potential for exceptional circumstances being demonstrated for the other site options, either individually or collectively, given the substantial shortcomings against satisfying requirements for sustainable development, including the proposed Delivery Strategy for Bovingdon. In this respect, these options perform substantially less favourably than the Grange Farm site.

The proposed Grange Farm site allocation demonstrates how, what should be considered the minimum proportionate level of growth at Bovingdon, can be sustainably delivered as part of a sound spatial distribution option, while also fulfilling the requirements of the Delivery Without prejudice to any future plan-making activities by the Council, these four rejected site options (under Site References 33, 34, 41 and 42) could only reasonably be considered in addition to the favourable option at Grange Farm.

Rejection of Proposed Site Reference 39: Homefield

Only Site Reference 39 (Homefield) is also taken forward for detailed consideration, together with Grange Farm, on the basis of minor potential constraints following detailed site Site 39 is also accorded potential for the delivery of additional community facilities.

For the avoidance of doubt, these representations support the view that there is no basis for conclusions to support the potential for exceptional circumstances to be demonstrated to support selection of Site 39 as favourable to the proposed allocation at Grange Farm. This assessment outcome should be reinforced in the Council's evidence base for the following reasons.

Firstly, Volume 3 of the Council's Site Assessment Study prepared by AECOM identifies a maximum gross capacity for the Homefield site of 112 units, which the Site Selection Topic Paper would be negatively affected by any inclusion of new community facilities. This is materially different to the assessment of the Grange Farm site, which has been consistently assessed as suitable with a gross capacity for around 250 dwellings as identified in the DBC Site Assessment Study and discussed directly with the Council as part of stakeholder engagement, prior to selection of the preferred approach and proposed allocation for 150 dwellings and land for a 3FE Primary School.

The capacity for development at the Homefield site is too low to contribute to a sound spatial distribution option, taking account of the requirements of the Delivery Strategy as it is only five hectares in area and would therefore be unable to

accommodate a three hectare school site. Selection of the Homefield site does not comprise a reasonable alternative to development at Grange Farm.

These representations support the Council's proposed spatial strategy and conclude that provision of a minimum 240 net additional dwellings over the plan period as itself a key component of providing proportionate growth in the Large Village of Bovingdon. Notwithstanding the potential for any higher capacity for growth it is clear that on a comparative basis with Grange Farm, the Homefield site can accommodate substantially less than this level of growth.

The Sustainability Appraisal findings for the Homefield site under objective 13 (housing) should be accorded uncertain or reduced positive effects as a result. Incorporating community facilities at the Homefield site, if at all feasible, would substantially reduce the effectiveness and overall benefits of the proposed Delivery Strategy at Bovingdon. Achieving the minimum quantum of residential development required, together with the requirements of the Delivery Strategy, would require the release of at least one other Green Belt site. The proposed Grange Farm allocation can meet all such requirements through the amendment of Green Belt boundaries on a single site and one that results in less impact on the Green Belt.

Bearing that in mind, the Council has not considered site selection options at Bovingdon comprising selection of the Homefield site and other rejected site options (with major identified constraints) that would be necessary to achieve the minimum proportionate level of growth identified as part of a sound spatial distribution option. It is axiomatic that any such combination of sites, if considered, would result in cumulative levels of Green Belt harm and potential adverse effects than the Homefield site, considered in isolation or when considered against the greater capacity for development on the self-contained Grange Farm site.

Thirdly, reasons for rejecting the potential allocation of the Homefield site in the Site Assessment Topic Paper and Sustainability Appraisal focus on highway safety and parking issues. However, it is clear that considered as part of the overall weighting exercise these reasons reflect that the Homefield site fall significantly short of addressing the overall requirements for the Delivery Strategy.

The Sustainability Appraisal records potential positive effects for objectives 4 and 5 (Climate Change and Air Quality) and objectives 10 and 11 (Health and Wellbeing and Sustainable Location). This is the same assessment outcome as the Grange Farm site. We disagree with each of these findings. The potential effects of the Homefield site should be reduced to **Uncertain**. The Site Selection Topic Paper recognises that:

*“Development is likely to have an impact on the local road network at peak periods, including, **Green Lane, High Street and Chipperfield Road.**”*

The Site Selection Topic Paper findings for Grange Farm do not identify potential additional impacts on the High Street. As it is at the opposite end of the village, beneficial effects of Grange Farm should in-fact be noted in terms of the potential to reduce pressure on the High Street associated with the potential relocation of the Primary School. The site potential benefits, including relieving existing pressure, would not and cannot be achieved by the Homefield, site based on the comparative site assessment findings. The Council's reasons for not selecting the site should recognise these constraints to providing for the wider Delivery Strategy.

Finally, the site assessment findings for the Homefield site are based on the strictly defined small-scale sub-area DA-SS2. The AECOM Site Assessment Study notes that its conclusions are predicated on assessing a single field of pasture and that the potential for readily identifiable and defensible Green Belt boundaries is contingent upon utilising existing hedgerows.

The Green Belt and Landscape Sensitivity Assessment (LDA Design, November 2020) prepared on behalf of our client disputes the strength of these findings when future requirements for sustainable development are considered with the Grange Farm site on a comparative basis. In relation to reviewing the findings of the Green Belt Assessment section 6.1 of the Report states:

*“our assessment notes that the hedgerow along the south-eastern boundary of Homefield/Fox Meadow would not be as strong a long-term Green Belt boundary as the roads that surround Grange Farm, together with their substantial roadside hedgerows. The GBR states on page 113 that the field boundaries in the northern part of BV-A5 could be strengthened to form a robust new boundary for the Green Belt, and that the hedgerows on the outer edge of D-SS2 ‘would provide a durable and defensible new boundary for the Green Belt’. However, in the assessment of D-SS2 on pages 61-62 in Annex Report 1, the GBR states ‘**the durability and permanence of this field boundary is questionable as a potential Green Belt boundary**’. This supports our view that release of the Grange Farm site would provide a stronger long-term Green Belt boundary.”*

Section 2 of the Report, regarding the findings of the Council’s Landscape Sensitivity assessment states:

*“Parcel (BV-A5) is judged to be within the ‘more degraded/eroded settlement fringe influenced landscape ...[with] a lower (moderate to low) landscape sensitivity’. However, the sensitivity rating summary continues that ‘**the intact hedgerow pattern and small- scale field network throughout the parcel are sensitive to development by virtue of the potential impact this could have on their integrity as landscape elements**’. Fox Meadow meets this definition being a small-scale field with an intact and mature hedgerow enclosure, therefore it could be considered that Fox Meadow is erring more to Moderate sensitivity than Low.”*

Additionally, the assessment (as also stated in the Council’s own AECOM Site Assessment findings) notes that potential visual impact and the sensitivity of the Fox Meadow/Homefield sites could be increased by the proximity of the Chiltern Way long distance recreational trail which passes the southeastern boundary of the site.

The conclusions of the LDA Report therefore state that attributing the Fox Meadow/Homefield sites a lower landscape sensitivity than Grange Farm is unjustified; and that the Grange Farm site, if allocated would, provide for a stronger long-term boundary. In terms of the potential for comparative assessment of potential impact on the Green Belt the LDA Report states:

“the assessment notes that realigning the Green Belt around the outer edge of the Grange Farm site would provide a stronger and more defensible long-term Green Belt boundary than would a realignment along the southeastern edge of Homefield/Fox Meadow, which has the potential to result in further encroachment on the wider Green Belt countryside in the future.”

A copy of the main extracts from the LDA Report are included at Appendix 4. A copy has already been submitted to the Council and can be reprovided upon request.

The Site Selection Topic Paper does not consider the potential impact on the strength of Green Belt boundaries when considering the overall requirements for development of Homefield and the Delivery Strategy. The potential impacts are likely to be exacerbated given the relatively limited capacity for residential development within the small-scale sub-area assessed, particularly if safeguarding land for new community facilities is considered. Based on the comparative gross site areas only 2 hectares would be left for housing and landscaping at Homefield following reservation of 3 hectares for a new 3FE Primary School, verses 7 hectares remaining at Grange Farm.

Moreover, the provision of any additional open space or compensatory measures to offset the proposed amendment of Green Belt boundaries would need to respect the relatively weaker boundaries identified.

The Grange Farm site can achieve enhancement of recreational opportunities and connections to the wider countryside (including the Nature Reserve to the west, and Bovingdon Green to the South) within the context of strong, new and defensible Green Belt boundaries defined by Green Lane/Chesham Road. As part of promoting the site throughout the Local Plan process the Council was provided with a statement of Potential Green Belt Compensatory Measures (May 2020). These reflect the potential for qualitative off-site enhancements to the Brickworks Nature Reserve and Bovingdon Green, both located and adjacent to the site together, with maximising the benefits to recreation and biodiversity enhancement as part of on-site provision. The representations would support strengthening the delivery of these measures through appropriately worded policy criteria and incorporation within the IDP, where adequately justified and costed.

Achieving the same outcome on the Homefield/Fox Meadow site would potentially lead to a requirement to further alter relatively weaker boundaries comprising existing hedgerows. When these factors are considered separately as part of the site selection process it is clear that negative weight should be attributed to the potential for exceptional circumstances to be demonstrated for the Homefield site. Both these sites do not provide any publically accessible open space adjacent to them, unlike Grange Farm.

Whiteacre highlights some inconsistencies between the assessment of policies and sites in the Sustainability Appraisal. Specifically, the assessment of **Policy SP27** records no strategy-specific predicted effects for Sustainability Appraisal objectives 2 to 5. This is despite the specific assessment for the Grange Farm having identified positive effects for climate change and air quality due to the accessible location of the site, proximity to the village centre and delivery of new local facilities with enhanced walking and cycling links.

The site-specific assessment also notes 'uncertain' potential effects in relation to Flood Risk. However, for the reasons given in the SA, supported by these representations it is considered that this objective should be assigned at least a positive classification. This is because the proposals include delivering flood alleviation measures which could deliver wider benefits for existing residents.

These representations support the Council's proposed spatial strategy and conclude that provision of a minimum 241 net additional dwellings over the plan period as a key component of providing proportionate growth in the Large Village of Bovingdon. Notwithstanding the potential for any higher capacity for growth, it is clear that on a comparative basis with Grange Farm, the Homefield site can accommodate substantially less than this level of growth and that only the Grange Farm site can accommodate the other requirements of the Delivery Strategy. These include safeguarding land for a new 3FE Primary School and enabling potential regeneration of the High Street.

Included files	
Title	Question: Evidence Base
ID	EGS15399
Person ID	1271257
Full Name	Mr Alastair Hogben
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified 'by the council with their internal 2020 review. The council 's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS15413
Person ID	1259631
Full Name	Fay Copestake
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	There does not appear to be an up to date Green Belt assessment. It appears that the plan has not properly justified building such a large proportion of dwellings on protected green belt land. I do not agree that this plan is up to date and it needs to be changed.
Included files	
Title	Question: Evidence Base
ID	EGS15439
Person ID	1271088
Full Name	MIKE WALTERS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflection of the individual characteristics of the land reflective in the policies attributed to their allocation. This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law. However, in each case referenced, the housing need calculation

is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.

Included files

Title Question: Evidence Base

ID EGS15446

Person ID 350823

Full Name Mrs Sue Yeomans

Organisation Details Chairman
Chilterns Countryside Group

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

THE CHILTERNES AREA OF OUTSTANDING NATURAL BEAUTY (AONB)

- Berkhamsted and Tring are set firmly within the Chilterns AONB with Green Belt acting as a soft edge and buffer between urban and natural environments. The Green Belt surrounding them is essential to the setting of the AONB and informs both the settlements themselves and the AONB. Green Belt and AONB are intrinsically interwoven, thus diminishing the Green Belt diminishes the In particular, the Green Belt on Tring's Eastern edge affords public access to and outstanding views to/from the AONB which would be lost if any of those sites were developed.
- As the Chilterns Conservation Board (CCB) is the statutory authority for the protection of the Chilterns AONB, its policies and position statements are highly relevant. The Board's paper: '*Development affecting the setting of the Chilterns Area of Outstanding Natural Beauty*' (CCB website) is pertinent to this Consultation and the proposals therein.
- Local authorities have statutory obligations set out in section 85 of the Countryside and Rights of Way Act 2000 '*to be mindful of both the possible 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 ' (ref. CCB paper point 13). Quite clearly with this Plan, DBC fails to fulfil those obligations.*

- It is the Group's considered view that insufficient weight and assessment has been given by the LP to those impacts and obligations. The LP Interim Sustainability Appraisal (non-technical summary) provides assessment criteria and then assesses these against options A-E if developed. (p6-9)

We do not accept the assessments for options A, C-E as accurately reflecting the true impact on (a) landscape (b) historic environment and (c) sustainable locations. Whilst we accept that *'effects will be very dependent upon the location and characteristics of the site'* we do not accept that developments of the Green Belt sites in Tring and Berkhamsted which are included in those options would be *'unsustainable'* with only *'minor adverse impacts on the SA objectives'*.

It is the Group's considered view that the Green Belt sites located in Tring and Berkhamsted identified in the LP would suffer the highest level of adverse impact and should therefore be assessed as *'very unsustainable'* with *'significant adverse impacts on the SA objectives'*.

We question whether the consultants employed for the Sustainability Assessment have actually visited these sites, or indeed whether Councillors representing areas other than Tring or Berkhamsted have done so. These are large swathes of significant green, tranquil and natural landscape, which informs the setting of the Chilterns AONB, a local and national high quality public asset, which any development of those sites would permanently destroy.

The CCG does not accept the statement that for these sites: *'new large greenfield developments could provide opportunities for biodiversity enhancements and make use of district heating systems'*. The sites in question already have significant biodiversity which we believe would be challenging to *'enhance'*.

Assessment of the sites in the *'Sustainability Assessment Working Note'*, DBC Consultation December 2017, does acknowledge the AONB and cumulative effects such as increased traffic, air and noise pollution caused by potential expansion of London Luton and Heathrow airports.

However, the CCG does not find the assessment outcome of these in the LP 2020 to be balanced in terms of negative/positive impact. The visual impact of aircraft and their contrails is not identified.

- The CCG does not accept the LP's assessment (*Appraisal of Sustainability p9*) of landscape sensitivity for Options C-E. The proximity of these sites to the AONB makes each significant in negative impact to the landscape should they be

- CCB's paper further states (CCB point 14): *'The setting of the Chilterns AONB does not have a geographical border. The location, scale, materials or design of a proposed development or land management activity will determine whether it affects the natural beauty and special qualities of the A very large development may have an impact even if some considerable distance from the AONB boundary.'*

The scale of the proposed sites for Tring and Berkhamsted would have grave and permanent negative impact on the AONB and on the quality of life for residents and tourists in this part of the Chiltern Hills.

- The CCB (point 15) gives examples of adverse impact upon the setting of the These include:
- *Blocking or interference of views out of the AONB particularly from public viewpoints or rights of way*
 - *Blocking or interference of views of the AONB from public viewpoints or rights of way outside the AONB*
 - *The visual intrusion caused by the introduction of new transport corridors, in particular roads and railways*
 - *Loss of tranquility through the introduction of lighting, noise or traffic movement*
 - *Introduction of significant or abrupt changes to landscape character particularly where they are originally of a similar character to the AONB*
 - *Change of use of land that is of sufficient scale to cause harm to landscape character*
 - *Loss of biodiversity, particularly in connection with those habitats or species of importance to the AONB*
 - *Loss of features of historic interest, particularly if these are contiguous with the AONB*
 - *Reduction in public access and detrimental impacts on the character and appearance of rural roads and lanes*
 - *Increase in air or water*

The CCG strongly supports the position of the CCB in its description of these. We find that all sites within the LP which require release of Green Belt will, at least to some degree, cause these adverse impacts upon the AONB's setting, and thus the AONB itself.

- The CCB's policy HE4 states: *'The conservation of the historic environment (including the setting of important sites and features) should be based on best practice'*. The conservation of the historic environment eg. views to and from Ivinghoe Beacon, the Grand Union Canal, Tring Park, Ashridge, the Chiltern Beech Woods, Pendley Manor and specific archaeological sites in Berkhamsted, will all be challenged by the LP.

The LP Appraisal of Sustainability (B1.4) states there are: *'visitor pressures on Tring Park, Tring Reservoirs, the Grand Union Canal and Ashridge now. As urban population increases, pressures on access to countryside and these key attractions will increase'*.

The LP fails to offer any measures which would alleviate or offer alternatives to diminish, or at least contain, these pressures. Increasing housing in the Borough by nearly 20,000 over the next 18 years will serve only to increase pressure on these key natural resources which cannot be offset by a green play area or open space surrounded by high density housing.

2.ix. In 2019, the independent Glover Landscapes Review report recommended that the Chilterns AONB be designated a National Park, thus recognising the extremely valuable benefits which the AONB already contributes to the UK and its future potential. The Chilterns are significant in affording easy access to natural, unspoilt, tranquil and green landscapes, now widely recognised as of key value to mental and physical well-being for city dwellers.

It is the considered view of the CCG, that to permanently destroy large swathes of Green Belt sites abutting the Chilterns AONB, as the LP proposes, could negatively affect the possibility of National Park status. This would be of great regret for the nation, the area and its population.

Included files

Title Question: Evidence Base

ID EGS15451

Person ID 350823

Full Name Mrs Sue Yeomans

Organisation Details Chairman
Chilterns Countryside Group

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION: Evidence Base comment

- The LP identifies there are ‘*uncertainties*’ (4.4.10) regarding pressure on existing services and unknown demand by an increased 4.4.11 states: ‘*It is unclear what infrastructure would be delivered to mitigate against negative effects in the absence of the Infrastructure Delivery Plan*’. With all due respect, we would have expected such a Plan, robust and well-researched, to be in place to inform sustainability and thus, choices of sites which could be developed. It would appear that sites have been chosen before any such essential studies are carried out.

Therefore, the CCG recommends that substantial and robust studies are carried out by DBC to inform decision-making on implementation of any, not just this, LP. This is particularly important for health, social care and education. Existing health service provision is already under strain and even for the lay person, it is relatively easy to see how these would not support the growth in population predicted under these proposals.

The CCG is concerned that whilst part of any planning consent for development of these large sites could require associated infrastructure provision and/or financial contributions from developers, historically, construction of such infrastructure lags behind development and occupation, thus putting pressure on existing resources for possibly many of the 18 year period of this Plan. Indeed, there is a risk, particularly with present economic uncertainties and unpredictability for the future, that developers could simply run out of money so key elements of infrastructure never gets built.

- The CCG is strongly against the release of any Green Belt in the Borough for housing development until all the requirements of the National Planning Policy Framework (NPPF) have been
- We find that DBC has failed to demonstrate ‘*the exceptional circumstances*’ which the NPPF requires before any Green Belt can be released for
- CCG does not find that DBC has fully explored all alternative options as required by Government and by the NPPF to avoid development of Green

Included files

Title Question: Evidence Base

ID EGS15468

Person ID 1271103

Full Name GRAHAM RITCHIE

Organisation Details FAIRFAX STRATEGIC LAND (HEMEL) LTD

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	SEE ATTACHED RESP
Included files	
Title	Question: Evidence Base
ID	EGS15510
Person ID	400475
Full Name	Mr Michael Demidecki
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The Topic Paper for the Chilterns Beechwoods SAC with its Main report, Summary of Evidence and 26 Appendices is extensive. I would like to see more discussion and appraisal of other wildlife sites and wildlife spaces around Tring. Five out of the nine SSSIs of course border Tring, and there is the existing Local Wildlife Site of Cow Lane Farm Meadows lying within Growth Area Tr01. The existing evidence base is therefore inadequate.
Included files	
Title	Question: Evidence Base
ID	EGS15522
Person ID	1162394
Full Name	Grahame Senior

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	
Included files	
Title	Question: Evidence Base
ID	EGS15541
Person ID	1271479
Full Name	MS JANE HARRISON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<ul style="list-style-type: none"> • Section 33A of the Planning and Compulsory Purchase Act 2004 requires that local planning authorities “engage constructively, actively and on an ongoing basis” in relation to strategic matters during the preparation of development plan • The ‘Duty to Co-operate’ as provided for in Section 110 of the Localism Act 2011 came into effect on 15 November. The duty was introduced under the 2011 Act to address the impact of the loss of “top-down” effect from the Regional Strategy and to offer a transparent way in which authorities should relate to one another on cross boundary issues. The duty is now shared between authorities requiring them to collaborate on cross-boundary matters and issues of sub-regional and regional importance, especially housing provision and infrastructure issues.

- The NPPF (Paras 24 - 27) is clear in directing LPA's as to the importance of the 'Duty to Co- Operate' and the proactive approach necessary to ensure a collaborative approach to reflect individual local plans. Para 26 states *'Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified '*
- DBC's Housing Policy Topic Paper (November 2020) outlines that DBC have been working with nearby authorities and other organisations as part of the preparation of the Local Plan, with discussions focused on strategic matters that affect more than one authority and include unmet housing, as well as employment and infrastructure needs across the South West Herts authorities grouping (Dacorum, Albans, Watford, Three Rivers and Hertsmere).
- We note at paragraph 5.46 of the Topic Paper the intension to prepare Statements of Common Ground / Memoranda of Understanding which will serve as important evidence to robustly demonstrate that the Duty to Co-operate has been fulfilled in the plan making
- We consider that it is vital that statements clearly detail the position of neighbouring authorities in respect of assisting DBC in accommodating its full development Paragraph 5.47 of the Topic Paper sets out that assistance from nearby authorities in meeting needs has been sought; however, it is recognised that neighbouring authorities are also facing substantial growth challenges and, as such, have advised that they are unlikely to be able to assist DBC, particularly in the case of housing. In light of this, it is essential that DBC explore all opportunities to meet needs within its own boundaries.
- The emerging Dacorum Local Plan seeks to plan for growth across the Borough for the Plan Period 2020-2038.
- The NPPF (revised July 2018, revised again February 2019) brought into effect the new Standard Methodology for calculating OAN for Plans submitted after 24 January The national standard methodology for calculating local housing need (LHN) is now the main evidence for housing need for DBC. At the time which the consultation was publishes, the LHN for DBC from 2020-2038 was 16,596 homes (**922 dpa**). The Local Plan seeks to deliver this amount per annum. We support the Council's approach in meeting the LHN and we note that this figure is a minimum and should not be seen as a maximum or cap for development.
- Whilst we acknowledge that the proposed supply reflects the evidence available when the draft Plan was being prepared, it will be important that the final Local Plan reflects the latest Government LHN figures if housing need is to remain as met in For Dacorum Borough, the latest local housing need figure, as per the revisions to the

Standard Method in December 2020, is **1,023dpa**. The Council will also need to take into account of any changes in the affordability ratio when the latest data is published in March 2021 and any additional uplift required to account for economic growth. Policy SP2 should be amended to state that the Plan will make provision for 'a minimum of **18,414 homes**'.

- Finally, in coming to a final LHN figure, the Council should also take account of any unmet needs arising from neighbouring areas (as required by paragraph 60 of the NPPF). In order to meet this requirement and for the Plan to be sound, the Plan must reflect the outcome of discussions with neighboring authorities and, as far as possible, seek to meet additional needs arising from neighboring
- The development of the Site could help meet the additional need arising from the updated LHN figure

Included files

Title Question: Evidence Base

ID EGS15543

Person ID 1271479

Full Name MS JANE HARRISON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

Included files

Title Question: Evidence Base

ID EGS15562

Person ID 1264530

Full Name BRENDA AND ROY HURLEY

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>I consider the council's Green Belt assessment as not up to date. The two stage review process of 2016 and 2017 pre-dates the 2019 Framework; which is sought to be justified by the council with their internal 2020 review. The council's assessment of Green Belt land within the Borough identifies substantial variances in the character, appearance and contribution of the Green Belt across it, and yet the allocation of land to suit local need requirements is arbitrability done, with no reflect ion of the individual characteristics of the land reflective in the policies attributed to their allocation.</p> <p>This is consistent with the approach to assessment of the Green Belt, wherein the council have attempted to justify use of outdated assessments in their 2020 review. But the review does not assess sites against the 2019 NPPF, simply seeking to show how compliant it could be with it. Heavy reliance in the review is placed on demonstrating exceptional circumstances have been met by reference to case law: However, in each case referenced, the housing need calculation is established and not in doubt. Paragraph 137 of the Framework cannot be met with this review, as it has not been proven that 5,945 homes need to be built in the Green Belt.</p>
Included files	
Title	Question: Evidence Base
ID	EGS15569
Person ID	1271578
Full Name	R Smith and A Lyell
Organisation Details	
Agent ID	1269623
Agent Full Name	Mark Harris
Agent Organisation	Associate Bidwells LLP
Yes / No	

- * Yes
- * No

**QUESTION: Evidence
Base comment**

In additional to the fact that the Development Strategy in the draft Local Plan does not identify sufficient development sites to ensure the minimum housing need is delivered, our client's concerns stem from the inappropriateness of the assessment process undertaken to establish which sites should be allocated for development.

These concerns can be summarised as:

- The blanket assumption that there should not be any development in the AONB,
- The assessment process, and
- The lack of consideration of wider benefits offered by particular

Lack of consideration of sites in the AONB

As set out in the introduction, our client's land lies to the west of Markyate. The site lies in the Green Belt with a small part of the site lying in the AONB, the boundary of which bisects the site near it's centre.

As is discussed further below, the proposal put forward though the call for sites would avoid any built development in the AONB other than a length of road to connect the development to Pickford Road to the north, and create a bypass around the settlement, helping to elevate congestion problems on the High Street.

The Council's Sustainability Appraisal (Page 33, Table 5.3) sets out that the rationale behind not seeking any development in the AONB is that the Council places great weight on its importance and will first look to allocate sites outside the AONB. It concludes that the evidence currently suggests sufficient non- AONB sites are available and therefore the option of allocating land in the AONB has been rejected.

Whilst the need to protect the AONB in line with national policy is understood, the Council's current approach does not allow for a proper assessment of sites, the quality of the AONB across the Borough and the impact that particular development proposals would have on the AONB.

There is nothing in national policy that sets out that development in the AONB should be avoided.

Paragraph 172 of the NPPF sets out that:

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.... The scale and extent of development within these designated areas should be limited.

The NPPF therefore seeks to conserve and enhance the landscape in AONBs and ensure any development in them is 'limited' - it does not prevent development. Therefore, particularly in light of the need to find additional housing land, for the Local Plan to be justified, the Council will need to ensure that assessment process looks at all reasonable alternatives and that the specific impact of any developments on the AONB is properly assessed rather than ruling out any development.

In the case of our client's site at Markyate, the majority of which lies adjacent to but outside the AONB, the site itself makes a limited contribution to the overall value of the landscape. As already stated, the proposed development, which has been carefully thought-out to give regard to the site's context, would look to improve the edge treatment to the west of Markyate with new buffer planting and open space, and, despite a short length of road in the AONB, would lead to an overall enhancement to the quality of the AONB, in line with national policy.

The assessment process

The Council's consultants AECOM have undertaken an assessment of 144 sites provided by the Council. The assessment narrows this down to 46 sites which were considered to be potentially suitable for development, albeit with some constraints. Our client's site, in part, was one of the 46 sites which was considered potentially suitable. These sites have then been subject to a Site Selection Process, as detailed in the Site Selection Report and the appendices. This process is fraught with inaccuracies and unjustified conclusions as discussed further below.

The site put forward for consideration by our clients is referenced in the AECOM report as site 110. AECOM identified a sub area (site 110a) as being the area potentially suitable for development.

Confusingly:

- 1 The AECOM conclusions (Site Assessment Study, Volume 3, page 148) suggest the site includes the Markyate Village It does not, this is outside of the site.

- 2 Area 110a lies outside of the site put forward for consideration by our client, referenced as site 110. This is the area of scrubland referred to in the AECOM
- 3 When the findings of the AECOM report are then taken forward for further consideration by the Council, it is concluded that site 110 is unsuitable for development. Instead a site referenced 105 (which my clients control) is assessed and the conclusions for the site change again, with the issues used by AECOM to reduce site 110 to a 'suitable' area, used to support the conclusions that the site should not be allocated for

The Site Selection Report (Appendix A) sets out for site 110:

The site has number of very significant constraints, most notably majority of site lying in AONB, the rest of site in the AONB setting, site in Green Belt, no means of transport access unless Site 114 is developed, and even then, highly indirect to services and facilities in Markyate. Overlaps with the larger Site 105 which is identified for detailed testing

This assessment shows a lack of consistency with the approach of AECOM and introduces the fact that site 105, which was not put forward by the landowners for development in the first place, appears to be the site considered by the Council as a potential allocation. This is clarified by comparison of the plans included within the various assessment documents, enclosed separately to this representation.

This is inappropriate and undermines consideration given to the specific proposal put forward by my clients, which responds to the constraints and opportunities offered by the site.

Without even considering the lack of justification for the assessment undertaken, addressed below, the whole site selection process is confused and there is a clear lack of continuity in the evidence trail, which needs to be rectified.

In terms of the detail of the site assessment by AECOM, the first issue is the reduction in the site area. The site has been reduced to a net developable area of 1.4 hectares which appears to be based partly on concerns over '*avoiding a large cul-de-sac with a single point of access, creating traffic bottleneck*'. There is absolutely no justification for such a conclusion.

Despite the conclusions of AECOM, Site 110 is accessible. Access is available from Pickford Road to the north, and would also be available though the site south of London Road (site 114), were this to logically be made part of the policy for the proposed site allocation, which is in the gift of the Council.

Access to a smaller, standalone development of the parcel identified below would also be achievable directly off High View/Farrer Top via an existing reserved right of access to the north, should access from Pickford Road not be deemed acceptable.

Even if vehicular access were only to be through site 114 (as AECOM have assumed for the smaller site) there is no rationale given for the reduction in site area – it is simply an unevidenced assumption. In the absence of any technical justification, the site should not be ruled out on transport grounds as this is not justified.

Concerns appear to be raised about '*highly indirect routes to the village via site 114*'. This is incorrect as the site has greater access to the services and facilities of Markyate than site 114 owing to the existing footpath connection to Pickford Road to the north of the site, which would take residents directly to the centre of the village and the services available. This appears to have been ignored with an assumption the access should be by car, despite there being very limited parking available on the High Street and existing issues with congestion. In reality, site 110 is more accessible to services and facilities than site 114 and from an access perspective, is a more sustainable location for development.

The AECOM assessment also seems to assume Markyate Village Green is in the site area. It is not, it is adjacent to the site and the relationship of the site to the Village Green should be seen as a positive, rather than a negative, given the health and well-being benefits the space provides – acknowledged in the Sustainability Appraisal as an issue in Markyate.

Whilst a new access to Pickford Road would need to take in land on the edge of the AONB, as was set out in the call for sites submission, all residential development would be kept out of the AONB and a new landscaped village enclosure provided to actually enhance the AONB, in line with national policy. This approach would leave around 5.6 hectares of developable land on the edge of the village, capable of delivering around 160 dwellings. The assessment process (both that of AECOM and the Council) fails to acknowledge this, making an assumption that any form of development in any part of the AONB or its setting should be avoided. This is not justified.

The conclusion of the Council in the Site Selection Report that '*the majority of the site*' lies in the AONB is simply inaccurate. Over 60% of the site lies outside the AONB and, as noted above, the only development that would be needed in the AONB would be an access road to the north east – which as discussed below would deliver significant highway benefits to the area. Combined with a lack of consideration of the potential enhancements to the landscape character of the area, the assessment process is based on inaccurate assumptions about the impact of development in the area on the AONB, which to be justified will require a detailed assessment, balanced against the benefits of the scheme.

The lack of consideration of wider benefits offered by particular sites

As noted in the analysis above, development at south of Pickford Road would deliver enhancements to the local landscape by way of the creation of a new landscape buffer to the west of Markyate. It would also deliver enhancements to the local highway network by creating a bypass for the congested High Street, and the existing staggered priority junction between Pickford Road and the High Street which is constrained and difficult to manoeuvre and as a result suffers from congestion and delay during peak periods, coupled with a resulting negative impact on the local environment. These issues will be exacerbated by the current approach in the Local Plan whereas the development of the land off Pickford Road and delivery of a link road for the village will bypass this central junction whilst providing a route towards junction 9 of the M1, which is the major demand for movement from Markyate, as picked up in the accompanying Access Opportunities Report by WYG, which furthers the justifies the case for the link. The development will also offer the potential for compensatory improvements to the Green Belt – required as a result of the release of Green Belt land through the Local Plan.

At no point does the assessment process take into account the benefits offered by the development of our clients' land, or we assume those benefits offered by other proposals. This is a fundamental flaw in the process and means that the development strategy does not incorporate sites that would, on balance, likely to be preferential to other sites identified for allocation which may be in slightly less sensitive areas.

The disregard for the potential highway benefits that could be delivered by development south of Pickford Road Farm in particular are a significant concern. The assessment process does not even acknowledge delivery of the bypass as possibility and take a view on the opportunity, simply looking at the site on a red line basis. This is a significant flaw in the process which we believe needs to be amended moving forward, particularly in light if the need to identity more land to meet the minimum housing requirement.

A similar issue was recently raised at the examination of the Central Bedfordshire Local Plan, with the Inspectors appearing to have concerns as to why the Council had ignored the specific proposals put forward for consideration by promoters and taken their own view on how a site could be developed, ignoring potential mitigation measures and the benefits of development. Without a change in the process, DBC are likely to have similar issues when the Local Plan gets to examination.

Our clients are keen to ensure that the development of the site would bring tangible benefits to the village and for existing residents. They would be more than happy to engage further with the Council to explore opportunities presented by the site, which could include new community facilities, allotments or recreation space, alongside a residential development. Their promotion is not just about building houses but leave a legacy that will enhance the village for all and they feel strongly that such benefits should weigh be a factor in determining the strategy for growth.

Included files	
Title	Question: Evidence Base
ID	EGS15573
Person ID	1271579
Full Name	
Organisation Details	BOYER PLANNING ON BEHALF OF W LAMB LTD
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	<ul style="list-style-type: none"> The review considers the key issues identified and our response to the conclusions that led to Land at Shendish not being allocated for development in the Draft Local This is particularly relevant given that the Council are now required to find sites to deliver an additional 1,818 dwellings over the Plan period as set out in sections 4 and 5 of this report, which should, in part, be met by an allocation on Land at Shendish. <p><i>Overall Approach</i></p> <ul style="list-style-type: none"> The Site Selection Topic Paper draws on site assessment work undertaken by AECOM and The AECOM assessments and subsequently the criteria against which the sites were assessed were relatively high level and when this is translated into the Site Selection Topic Paper Appendix B, it is difficult to discern the weighting applied by Officers in coming to their conclusions, given that many of the sites have similar 'rankings'. As such, there lacks transparency as to how some sites have been identified for allocation and others have not. It would be helpful to set out clearly a comparison between those sites in Appendix B identified for detailed testing. In addition, given the high level nature of the Site Assessment Topic Paper it is clear that some of the assumptions have not been as rigorously tested as is required by the process. This is particularly relevant to Land at Shendish, despite a series of technical assessments being provided to the Council in February 2019 (as contained in Appendix 4).

Shendish Manor and Fairfields (Site Reference 82)

- It is clear from the analysis set out in the proforma for Shendish Manor that the Council have not taken into account the detailed technical assessment work submitted in February 2019 when considering the criteria in the site selection process, or indeed the further information provided through informal engagement with

Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

- While in many instances, such as the Green Belt Review and the Landscape Assessment work the conclusions are similarly positive, of particular concern is the transport technical assessment dealing with highway impact and with access into the site. We therefore set out a brief summary of the key relevant access and highway improvements proposed

Access and Highway Improvements

- We set out below a brief summary of the key proposals that address the concerns raised:
- The existing access from London Road can be improved to provide an access suitable for residential development by:
 - upgrading the existing London Road/ Shendish Manor junction with a traffic signal junction; and
 - a proposed signal controlled shuttle working arrangement over the rail
- The proposed improvements will also include a 1.8m footway along the southern side of the carriageway. The footways will connect to the existing provision along London Road, including dropped kerbs and tactile paving provided across the access. There is no need to widen the existing bridge
- The proposed shuttle working over the rail bridge will operate with substantial spare capacity, with a maximum queue of two vehicles during the network peak hours.

- Similarly, the proposed site access junction with London Road will also operate with ample capacity with minimal queuing and delays at the junction in both the network peak
- The proposals also provide for two accesses along Rucklers Lane, designed with a 5.5m carriageway and 2.0m footways on either side of the
- Access from Shearwater Road is also possible, although the development of the site is not reliant on that
 - The Transport Appraisal Update Note included in **Appendix 5** indicates that the assessments Site Assessment work undertaken by DBC and Aecom does not appear to reflect the previously submitted technical reports (February 2019 (**Appendix 4**) and Transport Appraisal February 2020 (**Appended to Appendix 5**) have been reviewed. These reports address all the issues raised in relation to access and highway impact in full. The proposals have also been discussed with Hertfordshire County Council Highways with a copy of the meeting note is contained in **Appendix B of our Appendix 5**.
- We set out below an updated version of the Site Proforma for Site 82 Shendish Manor and Fairfields, which reflects the technical assessment work that has been undertaken to support the promotion of the

Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

DBC

Site Rank

Our Assessment and Commentary

Potential for new Public/ Community Facilities

The Vision Document and illustrative Masterplan (**Appendices 1 & 2**) demonstrate a range of public/community facilities to support a new village comprising of 500 dwellings based on the technical work undertaken to date including:

- Land for 2 FE Primary School with associated playing fields (to meet a wider need)
- 160 unit Care Village (439 residential units)
- Community Hub adjacent to School (with small shops, café, multi-use village hall)

- Station Plaza Hub - small shop/newsagent, café, bar, live work units
- Recreational facilities, children's play areas, playing fields

The delivery of a school site to serve both the development and wider need is seen as a critical component of the scheme. The Draft Infrastructure Delivery Plan clearly indicates that there is an under provision of primary school places in Kings Langley, with no deliverable solution to accommodate its proposed growth. Yet, the Draft Plan makes no reference to this in Policy SP26 Delivering Growth in Kings Langley. Given the sites close proximity and connectivity with Kings Langley, Land at Shendish could assist in meeting this need. In any event, there will be additional primary school need for the wider Hemel Hempstead area in seeking to accommodate the shortfall in housing.

Landscape

Given the nature of greenfield sites, any development is going to result in a change, as with the other sites assessed. However, the AECOM Volume 3 (pg 111) report notes the site is unlikely to have impact on the AONB and goes on to conclude that "the valley landform and tree cover make the site more suitable for allocation."

A Landscape Study was submitted to DBC in February 2019 (see **Appendix 4**) which indicates that the site is:

- Influenced by a mixture of urban fringe and countryside characteristics and character varies considerably;
- Urban influence from the SW edge of Hemel Hempsted along London Road; and
- Western end of Rucklers Lane is rural in character.

While the wider landscape including Shendish Manor, its parkland setting and golf course has a higher landscape value, the area identified for development is in the lower lying portion of the site and reflects the part of the site that has been assessed as having the lowest potential landscape sensitivity.

Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

There are also opportunities to introduce a strong landscape boundary to reinforce existing tree lines, introduce a landscape buffer, green fingers and a network of green spaces running through.

The DBC Landscape Sensitivity Study Report gives the site a 'neighbourhood' landscape value, which reflects the above and sets out mitigation to address sensitivities which have been incorporated into the Vision Document in **Appendix 2**. It does not indicate that the site is not suitable for development.

An Arboricultural Assessment was also submitted in February 2019 and is contained in **Appendix 4**. The large majority of trees are of moderate value with 7% of trees surveyed being of high quality identified and 40 low quality trees. There are no TPO's pertaining to the site or immediately adjacent land.

The presence of trees across the site and in the wider setting, provides a mature landscape framework around which the new community can be based creating a sense of place for new residents.

Green Belt Evaluation

The site performs well in relation to the Green Belt review and reinforces our assessment as set out in our February 2019 submission contained in **Appendix 4**.

There is an opportunity to enhance the existing landscaping, particularly along the site boundary to the west but also along the railway line and to deliver compensatory green belt improvements beyond the site boundary, given the wider landownership, such as playing fields, landscape and biodiversity improvements. As previously indicated Shendish Manor golf course and associated facilities are likely to be retained and reconfigured, providing the opportunity for additional landscaping and public access.

Flooding

The site is at low risk from flooding. A Preliminary Utilities and Drainage Appraisal were submitted in February 2019 which sets out in greater detail the approach to drainage as reflected in the Vision Document and illustrative masterplan.

Ecology

Many other similar sites considered in this assessment have been ranked green rather than amber in the Topic Paper assessment. It is not clear what the differentiation is between the sites. As noted in the assessment there are no known ecological constraints, however it goes on to state that the nature of the grounds are likely to mean that the land is rich in biodiversity.

However, the Ecological Appraisal submitted in February 2019 (**Appendix 4**) (which also assesses land beyond the site) states that subject to the implementation of a range of measures, there would be no reduction in the ecological interest of the site or its surrounds is likely as a result of sensitive development of the land proposed for allocation and development could in fact provide opportunity to enhance its nature conservation interest for a number of species through incorporation of a range of measures.

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Historic Environment

While the grounds of Shendish Manor are identified as a Local Registered Park, the boundary of the park is drawn immediately around the grounds at Shendish Manor, rather than the wider parkland, as confirmed in the Heritage Assessment submitted in February 2019 (**Appendix 4**).

The Assessment also goes on to confirm that the proposed development would not alter any of the important parts of the Grade II Listed Shendish Manor that contribute to the asset's significance, while in relation to the locally registered park and garden at Shendish Manor, there will be a small amount of harm to the wider parkland setting which can be mitigated. The report goes on to conclude that '*this assessment has identified no overriding heritage constraints that would preclude development within the site*'.

Highways Impact

The Transport Appraisal Update Note included in **Appendix 5** sets out a detailed response to both the Council's and Aecom's site analysis in relation to highways impact and notes that it does not appear that the previously submitted technical reports (February 2019 (**Appendix 4**) and Transport Appraisal February 2020 (**Appended to Appendix 5**) have been reviewed, which addressed the issues raised in the site assessment. The Update Note goes on to state that the Council's reasons for not allocating the site [in relation to highways] are ill founded (see paragraph 2.4.3).

The Update Note sets out a further access option to the north of the site via the Manor Estate onto Shearwater Road. There is a right to connect the two sites as set out in the Manor Estate S106 Agreement and it is confirmed in Update Note that there is capacity on the network to accommodate the development.

The original assessment work as well as the additional routing via Shearwater Road clearly demonstrate that the highway network can accommodate the development of Land at Shendish.

Public Transport

Land at Shendish is in a highly sustainable location, situated in the immediate vicinity of Apsley train station and bus stops on the London Road and is considered to be the best located site of all those assessed outside the town centre, in terms of accessibility to public transport.

As noted in the Transport Appraisal Update (see **Appendix 5**), the assessments undertaken by the Council and Aecom in this regard have been 'skewed' by a misconception that it would not be possible to provide a footpath across the railway line. However, the February 2019 and February 2020 Transport Appraisals set out technical solutions to address this issue, which are not reflected in the assessment which would deliver a 1.8m wide footpath across the railway line and enable a 5 minute walk time (400m) to the station from the centre of the site with hugely beneficial results in terms of sustainability.

Indeed, it is considered that Land at Shendish provides the best and only opportunity to provide such access to public transport and to assist with the Hemel Garden Communities objective of achieving a 60% modal shift.

Local Plan Reg 18 Representations | Land at Shendish Manor, Apsley

Access

The Transport Appraisal Update Note included in **Appendix 5** sets out a detailed response to both the Council's and Aecom's site analysis in relation to site access and in particular the access over the railway line. The Transport Appraisal Update Note states that it does not appear that the previously submitted technical reports (February 2019 and Transport Appraisal February 2020) have been reviewed, which address the access issues raised in the site assessment and demonstrates how this is overcome.

In addition, a further access is proposed as set out in the Transport Appraisal Update Note to the north of the site via the Manor Estate onto Shearwater Road. With Shearwater Road, there will be four vehicular access points as well as additional pedestrian routes. It is therefore considered that there is a robust access strategy.

Water and Wastewater

A Preliminary Utility and Drainage Appraisal was submitted to the Council in February 2019 (see **Appendix 4**) which provides an assessment in relation to the water and wastewater. Some reinforcement work would be required, however the relevant statutory undertakers have not indicated that new pumping station would be required.

Other Utilities

The Preliminary Utility and Drainage Appraisal submitted in February 2019 considers all utilities and sets out that it has been confirmed by the relevant providers that there is sufficient capacity in the gas and electricity supply network to accommodate approximately 500 dwellings.

Environmental Health

A Noise and Vibration Assessment was submitted in February 2019 (see **Appendix 4**) and indicates that the proposed site allocation is mainly exposed to sound from rail traffic on the Westcoast Mainline railway. The initial site risk assessment shows the site to be low to medium risk and a noise bund is proposed by way of mitigation.

An air quality assessment has been prepared which demonstrates that there will be no adverse impact arising as a result of the proposed development in relation to the highway network.

Minerals Consultation Area

The site is located in a Brick Clay Mineral Safeguarding area, however the area adjacent to the railway line is unlikely to be suitable for extraction due to health and safety and land stability issues. It is unlikely that it would be commercially viable to extract from the remaining site area and given the heritage sensitivities of the wider Shendish Manor parkland landscape, mineral extraction is not considered to be constraint to development.

- The above site assessment benefits from being populated with detailed site assessment information and data, from a range of detailed technical reports covering all the relevant criteria, rather than relying on the Borough wide high level assessment. While a series of technical reports were provided to the Council to assist with the site selection process, it is evident that this information has not been taken into
- As can be seen from the pro forma above, there are several criteria where it is demonstrated that the site performs significantly better than Council's assessment as set out in the Site Selection Topic Paper Appendix B (Sites for detailed testing).
- Given the review that has been undertaken of the DBC Site Selection Topic Paper criteria and the DBC Sustainability Appraisal relating specifically to Land at Shendish, it is evident that the site performs well and is the most sustainable site option and should be included in the Draft Local

- The focus for additional development to meet the identified shortfall of 1,818 dwellings over the Plan period, should be situated in Hemel Hempstead given it is the most sustainable location, as set out in sections 4 and 5 of these
- The Site Assessment Topic Paper considers a number of other Hemel Hempstead sites in Appendix B for detailed testing, including Land at Shendish. A comparison of Land at Shendish against those other sites is set out below, however it draws on a transport technical assessment comparison set out in the Transport Appraisal Technical Note in **Appendix 5** section 4.
- It is clear that Land at Shendish provides the best option for delivering part of the overall housing numbers shortfall required to meet the housing need for Dacorum.

[Please include highlighted table at the end of this section to these comments.]

Included files	W Lamb Ltd - Agent Alyson Jones - Boyer Planning - Table extracted.pdf
Title	Question: Evidence Base
ID	EGS15616
Person ID	1271748
Full Name	Ms Gosia Turczyn
Organisation Details	Wigginton Parish Clerk Wigginton Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	The evidence base is inadequate because a full consideration of all possible sites has not been carried out. Relying only on proposals put forward by developers may well be justified when the housing need can be accommodated relatively easily, but not when a substantial increase is required in a local authority area with not only a substantial percentage of Green Belt land but also an AONB. The council's own search showed potential for this approach but it was not given sufficient attention in the plan.
Included files	

Title	Question: Evidence Base
ID	EGS15678
Person ID	1253589
Full Name	Lucy Bennett
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I do not think the evidence base is adequate
Included files	

Title	Question: Evidence Base
ID	EGS15689
Person ID	1207333
Full Name	Growth Team
Organisation Details	Growth team Hertfordshire County Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION: Evidence Base comment	Appendix 3: Comments on the Draft Infrastructure Delivery Plan The county council notes that infrastructure prioritisation will be used to identify the order of the infrastructure being implemented i.e. critical, essential, required. The current draft does not include what infrastructure will fall into which

category, and it states in the document that this will be identified in consultation with infrastructure providers as the Local Plan develops. HCC welcomes the opportunity for discussion as the plan progress.

According to Chapter 11 of the draft IDP “Community Facilities infrastructure, for the purposes of this IDP, relates to Youth Connections Hertfordshire, library provision, community facilities (such as local centres), community centres, new CCTV provision for new local centres, adult social care, art/public domain and a crematorium.” There are proposals for several community centres to be built as part of the infrastructure in different areas. For example, five community centres are included in the draft IDP proposal for Hemel Hempstead area. It is not clear the exact use of these community centres, but HCC welcomes the opportunity for further discussion as the Plan progress. However, it might be best if adult social care could be looked at separately as a different category.

It should be noted that potential infrastructure costs provided are for indicative purposes only and is subject to change. Some of the services have not provides a figure towards the calculation such as ACS, SEND, etc, and there are many other factors that would have an effect towards the final cost of the financial contributions.

Appendix B – Rest of the Borough – There are a lot of blank fields and assumptions made on education provision on the table. For education, no estimated costs are given and suggested that “utilise existing capacity and expansion if necessary” would be the way forward. Due to cumulative effect, it very much depends on where these 241 units will be delivered and the proposed solution may not be possible, e.g. Places in villages such as Gaddesden is in deficit.

Included files

Title Question: Evidence Base

ID EGS15705

Person ID 1263400

Full Name Edwin blenkinsopp

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment it is common knowledge that the science does not support this proposal
 eg ons data shows only 355 houses a year are NEEDED and it would be in CURRENT residents best interests to have a lower level than that

Aside from the science the area of boxmoor trust lands is nationally accepted as pleasant with the low lying adjacent buildings and higher views of hills and trees it will change the nature of the area to have this dramatic unnecessary increase, this is a plan for tomorrows slums- shame on those that put there name to and vote for such a poorly planned (but high profit!!) proposal

Included files

Title Question: Evidence Base

ID EGS15714

Person ID 1273151

Full Name Ms Megan Green

Organisation Details Senior Planner
Thakeham Homes Ltd

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION: Evidence Base comment

It appears from a review of the Council's evidence base, that the Site was not pursued as a potential allocation as a result of its assessment under site number 34/34a in AECOM's report (Site Assessment Study for Dacorum Borough Council Volume 3: Final Site Schedules dated January 2020). The Site was incorrectly assessed within the report on the basis of the red line being inaccurate. Despite previous submissions to the Council demonstrating that the Site boundary extends to the junction of Louise Walk/Green Lane, the access land was excluded from the AECOM assessment. On Page 42 of AECOM's assessment it concluded "*The site is not directly accessible from the local road network and would require access via Site 39 'Homefield' and/or from Louise Walk (across intervening land not within the site promoter's ownership)*". Further, this Assessment states that the site is "*susceptible to surface water flooding*" which contradicts the Environment Agency's mapping. Thakeham requests that the Council corrects this and re-considers the merits of the Site as part of its next review.

Notwithstanding these errors, the overall site conclusion is "*Site performs reasonably across a number of different criteria including Green Belt, agricultural land, and transport. However, it performs poorly on spatial opportunities and constraints. This is, however, easy to mitigate through appropriate amendment of site boundaries, with the southern part of the site excluded and the new boundary known as site 34a for the purposes of this study; this would also improve its performance on the transport criterion in terms of accessibility to the rest of the settlement. The allocation of 34a could be offset by*

compensatory improvements to that part of the site not allocated but remaining within the Green Belt and in the same ownership, in line with NPPF paragraph 138. Subject to this amendment, site considered potentially suitable for allocation with major constraints". As demonstrated in the Vision Document, the proposed layout respects these conclusions by focusing development on the area referred to as 34a and the remainder of the Site will remain largely undeveloped due to the Site's proposed sports use, which is protected in Paragraph 97 of the National Planning Policy Framework (NPPF).

Included files

Title Question: Evidence Base

ID EGS15773

Person ID 1271978

Full Name JOANNA HARLEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION: Evidence Base comment

We note the discussion provided in Topic Paper 'Development Strategy November 2020': this tracks the history, marshals the data and argues that the dwelling numbers for the Reg18 Plan meets the housing needs for the Borough viz 922 [or recently 1023] pa. We dispute this is the correct basis for the Plan – which is based on 'national requirements' rather than local needs.

The paper includes a comment:

"6.7 – The preferred strategy is based on meeting the Borough's development needs. The Council has concluded that, on balance, this is the most appropriate approach in accordance with national requirements, while recognising that it raises a number of significant challenges for the Borough. Not meeting its housing and other needs could result in:

- the Plan being found unsound and the loss control over unwanted, speculative schemes and its ability to protect areas from development;*
- losing opportunities to properly plan for and coordinate essential infrastructure, community facilities, and affordable homes; and*
- increasing in-commuting, worsening housing affordability, and economic growth hampered by a shortage of housing."*

Below we set out data drawn from reliable sources e.g. ONS and the study commissioned by the Districts' joint Housing Needs Assessment quoted in the Plan.

The current dwelling numbers established in the Adopted 2013 Core Strategy sets an annual build rate of 430 pa.

- The Data shown in Fig 2 Housing Trajectory 2020 – 2038 [p 38] records anticipated completions across the Borough for 2020/21 as **654** and 21/22 as **1036** . These are well in excess of the Core Strategy and also the numbers projected by

The numbers set for the Draft Plan have been based on the ONS projections of housing 'need' but manipulated by a formula adopted by MHCLG to determine the 'national requirements' stated in Para 6.7 above.

Dacorum

ONS projection of Dacorum annual housing growth

After adjustment by MHCLG algorithm

After adjustment by MHCLG algorithm

ONS 2014

730

1023 [new standard applied]

ONS 2018

355

922 [mutant applied]

497 [new standard applied]

As a result, this Council objects to the adoption by the Borough of the Ministry's numbers: a lesser number to meet the assessed local needs must be agreed upon. This must lead to a revision of the site allocations and a new Plan.

We note the data in Table 6 Affordable Housing Need across South West Hertfordshire [page 62] indicates an assessed need of 611 dwellings pa.

DACORUM

Rented affordable housing

363
 Affordable Home Ownership
 248
 TOTAL
 611

We also note that the Borough assumes a continuing policy of requiring 40% of new dwellings should be allocated as 'affordable' on Growth areas [viz Green Belt], with 35% in the urban area of Hemel Hempstead and 40% elsewhere [DM 1 para a.]

For an area with acute need for homes at 'social rents' [see Para 14.29 et seq p 62] should the proportion not be increased to 50 or 60%?

This would change the market dynamics and deliver a better share to the community of the uplift to land value following the release of (mainly) Green Belt land and consent to development.

Included files	
Title	Question: Evidence Base
ID	EGS15778
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Evidence Base. Development numbers are based on an out of date matrix and are far too high. The plan consistently goes against Guidance of the use of Green Belt, takes no account of current changes to life after covid or the need to protect our environment urgently.
Included files	
Title	Question: Evidence Base

ID	EGS15779
Person ID	369415
Full Name	Mr Dacorum EnvironmentalForum
Organisation Details	Chair Dacorum Environmental Forum Waste Group
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>The following have yet to be produced:</p> <ul style="list-style-type: none"> • Climate Change and Sustainability SPD • Detailed Design Guide SPD • Climate Change Strategy and Action Plan <p>Until these documents are produced and made available for public comment, the NLP should be considered incomplete.</p> <p>For our full response see: The attached document if you are receiving this by E-mail The link below if you are viewing this online http://dacenvforum.org.uk/ and look under "Consultations etc."</p>
Included files	
Title	Question: Evidence Base
ID	EGS15780
Person ID	1263887
Full Name	Atherton Powell
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	the world has dramatically changed since the Evidence Base was gathered.
Included files	
Title	Question: Evidence Base
ID	EGS15781
Person ID	1261199
Full Name	Will Bentley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	You are not using the latest ONS statistics to forecast housing demand or taking into account all relevant NPPF clauses.
Included files	
Title	Question: Evidence Base
ID	EGS15782
Person ID	1264636
Full Name	Lynsey Bilsland
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	numbers are based on an out of date national strategy rather than more recent data.
Included files	
Title	Question: Evidence Base
ID	EGS15783
Person ID	1264657
Full Name	Amanda Hutchinson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	<p>There is no account taken of the current COVID-19 pandemic and the potential effect on the way people live and work in the future.</p> <p>There is insufficient effort to determine brownfield sites suitable for redevelopment and a lazy reliance on green belt land.</p> <p>There has been insufficient consultation as to the future needs of the area and how these are to be reconciled with the climate emergency, the environmental impact of the proposals and the probable change in behaviour following the current pandemic.</p>
Included files	
Title	Question: Evidence Base
ID	EGS15784
Person ID	1264035

Full Name	Alex Knowles
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Please refer to email and document attached. The evidence base is hugely flawed for many reasons.
Included files	Dacorum Planning Objection Letter_Redacted.pdf
Title	Question: Evidence Base
ID	EGS15785
Person ID	1264752
Full Name	Chris Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	I disagree the evidence base is up to date. See my earlier copmments for evidence as to why I believe this is the case.
Included files	
Title	Question: Evidence Base
ID	EGS15786
Person ID	1264794
Full Name	Tim Hamper

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	As noted above, since the rationale and Evidence Base activities for the Local Plan have been undertaken, we have endured a Covid pandemic. This has changed forever the nature of work, transport, housing requirements and sustainable development. There is a very major risk that the current Dacorum planning process (specifically including the Local Plan) is out of date, and a positive hindrance to post-pandemic recovery growth. Time to rethink the entire approach (including the Evidence Base), not press on with a process that is no longer fit for purpose.
Included files	
Title	Question: Evidence Base
ID	EGS15787
Person ID	1264959
Full Name	Neil Fraser
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	For reasons given above I haven't time to read through all the plan. I would question the evidence that that many new homes are needed. The homes that have been built in Dacorum over the past few years, have not all sold quickly. An example is those at Upper Bourne End. I'm concerned that many of the new homes proposed will be too expensive for enough people to buy, even the affordable ones. I haven't time to look at your evidence that says that the homes will all be affordable to enough people that want to live on each of the sites. Have you calculated whether we still need the same number of homes, now we have left the EU?
Included files	

Title	Question: Evidence Base
ID	EGS15788
Person ID	1145686
Full Name	Mrs Sarah Gray
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION: Evidence Base comment	Probably not as all pre-covid
Included files	

27 National Planning Policy Guidance responses

Title	Question: National Policy and Guidance
ID	EGS99
Person ID	1255447
Full Name	Andrew Sparrow
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS154
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

**QUESTIONS NPPF
comment**

In the Government document ref **section 2. Achieving sustainable development**; Paragraph 9 it states “*Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area*”. I take this to indicate the policy is just advisory and intended plans should be reviewed locally hopefully involving people of the existing communities. This is much indicated in the following statement in paragraph 12 “.In **section 4. Decision-making** paragraph 52. “*Communities can use Neighbourhood Development Orders and Community Right to Build Orders to grant planning permission. These require the support of the local community through a referendum. Local planning authorities should take a proactive and positive approach to such proposals, working collaboratively with community organisations to resolve any issues before draft orders are submitted for examination*”. I take this to mean that local people with in the local communities will have an actual say into any local development. **Sections 5 Delivering a sufficient supply of homes and 6 Building a strong, competitive economy**: are covered in the DBC strategy plan, although I still have reservations about using green belt land and the demise of hedge or woodlands. This is why I support the statement in **section 11. Making effective use of land** ref paragraph 117. “*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land*”. Plus paragraph 118 “*b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production*”; With ref to paragraph 123 c) “*local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework*”. I reference this respect of the planned Gypsy and Travellers pitches increase with in the plan. This land would surely be better utilised for building permeant dwelling for local residents. In **section 13. Protecting Green Belt land and section 15. Conserving and enhancing the natural environment** my main questions is who will police the planning applications to ensure these directives are maintained and who will have the last say in any application.

Included files

Title Question: National Policy and Guidance

ID EGS233

Person ID 490644

Full Name Mrs Helena Holliday

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes	
* No	
QUESTIONS NPPF comment	<p>I understand that local authorities are obliged to have a current Local Plan in order to control development. DBC is obliged to provide for development of over 16,500 houses due to government policy. However, government policy seems to be on the cusp of changing because there is a move to change the focus of housing development from the south towards the north of the country (the "Northern Power House") https://www.pbctoday.co.uk/news/planning-construction-news/north-south-housing-crisis/84337/</p> <p>However, there still needs to be a current Local Plan to control development. I just hope that this plan will be revised to take into account changes in emerging government policy regarding the levelling-up of the north/south divide.</p> <p>Also, authorities are meant to liaise on housing, which could facilitate New Towns, which can be planned holistically, for major developments.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS267
Person ID	1207707
Full Name	Mike Beavington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS331
Person ID	1259852
Full Name	Imogen Wagstaff

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	It is not compatible because it does not take account of greenbelt constraints or the Chilterns AONB in considering the scale of housing development and need.
Included files	
Title	Question: National Policy and Guidance
ID	EGS496
Person ID	1258240
Full Name	Adele Giles
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS647
Person ID	1261183
Full Name	Oliver Fairfull
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>Growth at any cost is not the answer. The "vision" mentions sustainability throughout, but none of this growth is sustainable. Overloading areas with a population it cannot support will be detrimental to the countryside, farm land, green space and the lives of those who have chosen to live in the area. Steady and monitored growth means strategic thinking and adapting to changing conditions. Build the infrastructure and only then, grow in line with that. The policy as it stands is to build at a rapid rate, seemingly at any cost.</p> <p>My experiences are of living in Tring, but it is likely the sentiment is echoed all through the Borough. For example, it is already hard to get a doctors/dentist appointment. Increase healthcare capacity, then grow the community.</p> <p>The employment growth you are forecasting is simply a proposal and not a reality. We simply can't know what the economic situation will be – some of your plan may succeed, but others will likely falter. Build the economy, then build the housing.</p> <p>Tring is a commuter town and a (significant) proportion of new inhabitants will likely commute to London on a trainline already at capacity. Station car parks are full before rush hour is over - where is the proposal to increase that capacity? You mention building a better link between Tring and the station, build it first and demonstrate that it works. What is currently in place is dangerous for pedestrians, cyclists and drivers. A small cohort will cycle in any weather, many (including me!) will not and will resort to driving. You also can't change the existing road infrastructure; Tring high street is extremely narrow. A single vehicle stopping (eg deliveries, mail van) backs up traffic. Increasing housing in Tring by such radical numbers will result in far more congestion and pollution – flying directly in the face of your environment plan. It's easy to demonstrate now that people drive to the town and do not walk, and an increase in population will result in increased traffic, particularly as the green belt sites are some distance from the town centre.</p> <p>Residents in this area should not be made to pay for short sighted thinking. The proposal to build vast numbers does one thing; makes developers very rich. They will build the standard "cookie cutter" houses, with minimal space between properties, minimal parking and a minimal green space. Once they have been paid, they will leave and having irreparably changed the face of the town, we, and future generations will be left to suffer the consequences.</p> <p>These new estates seen all over the country are the modern equivalent of tower blocks build in the 60s. We will look back in 50 years and wonder why anyone thought they were a good idea. The example to the west of Tring is a key demonstration of this. Decorating the house that face the main road with a pretty stone façade is just that, a façade. Look within the roads and you see narrow houses, squashed in at the edge of town, forcing people to drive to town. Maximising profits for developers, ignoring the real needs of the town inhabitants.</p>

In the original "vision", I believe the proposed number of houses in Tring was between 600 and 1100, which seemed absurdly high. You have now raised this to 2,731 (an odd number, how can you be so exact? Presumably because this was calculated by a formula rather than rationale thought) but cannot see any justification for that alarming increase. I made the same points then, grow the infrastructure and then grow the housing stock, not the other way around. Targets are not the answer. Destroying green belt and farm land is not the answer. Once you have made these mistakes, we cannot go back.

This may be mandated from Westminster, but your job as our local representatives is to fight back. I am not anti-growth – our population is expanding, but we need to grow in a sustainable, controlled way, not mandating the growth of a town by 40-50%. I spent many hours reading through the 2017 documents and responding. Now to find out that you are “doubling down” on expansion at such a rate is very disheartening. Many people do not have the time to read through such lengthy document and reply but their lack of response should not be taken as de facto approval. We love where we live. Please, take the time to make the right choice and not put this monstrosity of a plan into action.

Included files

Title Question: National Policy and Guidance

ID EGS672

Person ID 1261122

Full Name Mark Slade

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

Included files

Title Question: National Policy and Guidance

ID EGS815

Person ID 1261352

Full Name MR JAMES GROUT

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS822
Person ID	863317
Full Name	Mr John Allan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS844
Person ID	1261434
Full Name	Mrs Louise Harper
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	I do not have the knowledge to comment.
Included files	
Title	Question: National Policy and Guidance
ID	EGS855
Person ID	1259318
Full Name	Anna Ashwell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS954
Person ID	1205804
Full Name	Mrs B. Watson
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	Dont know
Included files	
Title	Question: National Policy and Guidance
ID	EGS1011
Person ID	1261434
Full Name	Mrs Louise Harper
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	I do not have the knowledge to comment.
Included files	
Title	Question: National Policy and Guidance
ID	EGS1179
Person ID	1143779
Full Name	Ms Julia Marshall
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS1211
Person ID	1261875
Full Name	Fiona Silver
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	It is completely inconsistent with the NPPF because it fails to protect Green Belt land as the NPPF requires.
Included files	
Title	Question: National Policy and Guidance
ID	EGS1251
Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

<p>Yes / No * Yes * No</p>	<p>No</p>
<p>QUESTIONS NPPF comment</p>	<p>The Plan does not comply with the NPPF in several respects, as identified below.</p> <p>These comments relate specifically to proposals regarding Tring. There may be other parts of the Plan which are also non-compliant with the NPPF.</p> <ul style="list-style-type: none"> • Para 11(b) of NPPF requires ‘... <i>objectively assessed needs for housing...</i>’ <ul style="list-style-type: none"> • The number of houses proposed for Tring is in excess of the number calculated in the September 2020 South West Herts Housing Needs Assessment prepared by GL Hearn. • No objectively assessed reason(s) for this given in the Plan. • The Plan could be at risk of being determined as being ‘unsound’ for this reason. • Para 20(c) of NPPF requires ‘... <i>sufficient provision for community facilities (such as health...)</i>’ <ul style="list-style-type: none"> • Regarding the combined impact of Tr01, Tr02, Tr03 population increase in Tring, there appears to have been no assessment of the impact on capacity of existing primary care provision in Tring, nor time-scaled provision for additional primary healthcare facility to bridge the gap. • Para 20(d) of the NPPF requires ‘... <i>sufficient provision for conservation and enhancement of the natural environment including landscapes and green infrastructure...</i>’ <ul style="list-style-type: none"> • At Tr01, Tr02 and Tr03, whilst the existence of existing and historic field boundary patterns is recognised, there is nothing about their conservation. Many of the hedges in all three areas are over 600 years old as determined by the standard method of number of woody species per 30 metres of hedge length, and as such should be protected by law. • Paras 24-27 of NPPF require cooperation across administrative boundaries. <ul style="list-style-type: none"> • Regarding Tr01 and proposal for warehousing, there is no evidence of any discussion with the adjoining Aylesbury Vale District Council regarding the option of using existing industrial/employment land in AVDC at College Road North just 3 miles west of Tring for that warehousing. • Taking that option could generate much more employment in Tring than warehousing by, for example, freeing up land for a residential home. • The provisions for green/wildlife corridors (especially in Tr01, 02 and 03) are confused and inadequately defined. In particular, the corridors are poorly linked together and do not explicitly protect the hedgerows (including Marshcroft

Lane) and the surrounding countryside that are a key part of the character of the area and vital to local biodiversity. **Overall, the Plan for Tring falls short of NPPF para 147, and paras 99/100.**

- NPPF requires that development on Green Belt land achieves net environmental gain (NPPF para 72c) and is mitigated by compensating development of surrounding natural spaces; there is no evidence that this has been adequately considered. Although considered for NT Ashridge, it is not considered regarding the key 'honey pots' of Tring Park, Stubbings Wood or College Lake.
- Housing densities on Tr01, Tr02 and Tr03 are not stated, despite seemingly being required by NPPF para 123b.
- To meet NFFP requirements, 'wildlife corridors' need to be made explicit and mapped (NPPF para174), along with their linkage to existing wild/natural areas. This has not been done in the Plan.
- Policy SP23. There is no timescale given for any of the numbers (overall or by site) for the proposed housing sites in Tring, and yet these must exist as the overall growth for Dacorum is profiled by year. Why is this not stated, as required by NPPF para73?

Included files

Title Question: National Policy and Guidance

ID EGS1345

Person ID 1145350

Full Name Mr Edward Murray

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment

Included files	
Title	Question: National Policy and Guidance
ID	EGS1364
Person ID	1262046
Full Name	Mr Richard Abraham
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	Have answered 'yes' as I believe much of the plan is foisted upon the Borough by Central Government.
Included files	
Title	Question: National Policy and Guidance
ID	EGS1380
Person ID	1262050
Full Name	Mr Martin Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	

Title	Question: National Policy and Guidance
ID	EGS1538
Person ID	217987
Full Name	Mr Chris Watson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	

Title	Question: National Policy and Guidance
ID	EGS1596
Person ID	1149465
Full Name	David Reavell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Guidance has changed.
Included files	

Title	Question: National Policy and Guidance
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ID	EGS1610
Person ID	1261385
Full Name	stephen hearn
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>Growth area TR06 – off Brook Street Tring</p> <p>TR06 comprises Tring Market Auctions, The Tring Local History Museum, the Fire Station and Forge Car Park.</p> <p>Tring Market Auctions is located at the rear of the site of TR06 with access from Brook Street and a license to access the Forge Car Park.</p> <p>The ownership of the site is divided between Tring Town Council (Auction Rooms, Museum and the Market Place <i>hardstanding area</i>), Dacorum Borough Council (Forge Car Park) and Herts County Council (The Fire Station). The Freehold ownerships make it a somewhat complicated issue should planning proceed.</p> <p>In the proposal, no mention has been made for Tring Market Auctions to be included in the future plans of TR06, but mention has been made that if the site is re-developed Tring Market Auctions would be offered an alternative site in the town – where? The Auctions currently comprise about 16000 sq ft of buildings alone together with the adjoining parking areas. No detail has been provided and no mention of re-location provisions has been made. It appears the proposals are an afterthought to the Dacorum local plan. Tring Market Auctions occupy under the terms of a lease with Tring Town Council.</p> <p><u>The History and Current use of the Site</u></p> <p>In 1893 under the requirements of the Board of Agriculture and with the assistance of Lord Rothschild, the sale room with office was constructed in Brook Street. It was let to W Brown & Co. who conducted the first sale by auction in January 1894, since when auctions and sales have been held continually on the site for over 125 years – surely this qualifies the location to be part of Tring’s heritage.</p> <p>During recent years from 1960 there has been numerous enquiries and planning applications to develop the site with offices and supermarkets together with residential, all of which have been rejected.</p> <p>In 1993 the livestock auction ceased to operate leaving the chattel auction business to continue and flourish under the directorship of Stephen Hearn who took Tring Market Auctions to become independent and grow into the fine company it is today.</p>

It now has an extensive complex of four Auction Rooms, forming one of the largest and best known venues of its type in the Home Counties.

The sales attract a very large number of vendors and buyers from Tring and the surrounding towns and villages together with an ever-growing number of people from throughout the Home Counties and Internationally. Many of the buyers represent the trade and other specialist collectors in all categories.

The auctions provide a friendly and entertaining atmosphere on sale days making it an enjoyable venue for both business and pleasure. Regularly around 500 visitors attend on viewing and sale days, many of these attending the auction visit the town shops and local attractions.

Tring Market Auctions is a unique and key component of the town's economic town centre fabric. It provides a key fulcrum for maintaining the town centre economic sustainability. Visitors to the auctions provide business for other local shops and enterprises not just on sale days but across all the sites activities, its town centre location is fundamentally linked to many other local business and the town market continued sustainability.

The auction rooms provide a unique component part of maintaining Tring Town Centres' viability and supporting Tring based economic development. If Tring is expected to grow then business, jobs and economic infrastructure growth needs to be matched, Tring Market Auctions needs to be maintained as it supports this economic ambition of the Local Plan through continued town centre provision of a business that is complementary to local shops and does not provide competition, as would the proposed supermarket.

The Saleroom operates with a permanent staff of some 20 people which includes consultants and additional part time staff during sale days. The venue is a key local employer, bringing training and development and job opportunities for local young people.

The Auction sales deal with all periods of furnishings and collectables, processing over 50,000 lots each year providing an effective and affordable house furnishing option for many local people. It has a growing importance as a recycling centre, particularly when it is estimated over 20 tonnes of furniture timber is recycled every fortnight, which supports the climate ambitions in the Local Plan.

In addition the Auction provides a key income stream to the Town Council reducing precept impact on local residents and contributing to a sustainable model of local government

The Auction provides a service to both the local community and professional organisations throughout the Home Counties and beyond.

Points of Consideration

- It is positioned on a site with a long history of auctions and marketing of stock
- It is an important asset for the Town
- The auction attracts a large number of visitors to Tring throughout the year
- It employs local townspeople
- Town Centres should reflect the distinctive characteristics of a Market Town
- The site would not lend itself as a supermarket, particularly when this proposal is unproven

- The Auction Rooms occupy a strategic position at the head of an open space and wildlife corridor which runs from the Tring Park Mansion vista through to Icknield It is very much part of the local community, supporting many of the Town's organisations and groups

Planning Matters for Consideration

- Brook Street has a notorious reputation for being dangerous in parts where it is very narrow making it often difficult for vehicles to pass
- Tring High Street has introduced traffic calming measures
- It is suggested in the development plan that a supermarket would be served with a new carpark. Bearing in mind the development would include the existing Forge Car Park, does one interpret this as denying the town parking facilities
- Recently, two large planning applications have been refused in Brook Street both in close proximity to TR06, one being the residential re-development of Market Garage and the introduction of a residential development on the North Eastern side of Silk Mill works. In both instances, the reason for refusal included over-development of the respective sites and the dangers of access to Brook Street
- The plan proposals to create new food and drink leisure uses is difficult to understand when there are currently so many retail outlets available in Tring
- It states that any re-development of the site would only be permitted once replacement facilities are provided elsewhere in the town. The only specified new location is in Growth Area TR01 (Dunsley Farm) for the Fire and Rescue There is no detail with regard to the siting of Tring Market Auctions, nor the Local History Museum.
- One can create new buildings but one cannot create history

TR06 is not a redundant site, it forms an important part of Tring Town Centre with Tring Market Auctions and the local Museum providing both business and pleasure to hundreds of people throughout the year.

Included files	
Title	Question: National Policy and Guidance
ID	EGS1638
Person ID	1262323
Full Name	Emma Hilder
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	

* No	
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS1673
Person ID	1165136
Full Name	Mr & Mrs J.D Battye
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>Before we answer the consultation in detail we would like to point out how totally inappropriate and inopportune it is to consult on this draft plan at a time when the Government itself has admitted that the algorithm on which house building targets are based is itself flawed and has not yet been satisfactorily revised. The proposed distribution of new housing directly contravenes announced (and re-iterated) official policy, contained in the Government’s election manifesto, to level up economic growth and prosperity throughout the UK. Growth is needed in many other parts of the country but not in London and the South-East. Furthermore, current Green Belt policy looks as if it is being specifically flouted (see below.)</p> <p>Additionally, as admitted at 1.3, 2.26 & 9.8, the medium and long term socio- economic effects of both Brexit and Covid-19 are yet to be fully felt, let alone evaluated. Basing future policy on past assumptions will inevitably produce the wrong results and yet should the plan be enacted the damage will already have been done to existing communities, the environment and biodiversity alike. Indeed any Joint Strategic Plan is not due to come into force until the end of 2023. (1.41)</p> <p>The Government can hardly expect planning authorities to produce sustainable and viable plans if they are based on suspect assumptions and incomplete data. Surely it would be more productive to insist on receiving a clear and accurate articulation of policy before rushing into consultations posited on dubious foundations. The goalposts have already been shifted from 922 houses pa to 1023 which puts the target much closer to the 1100 level which the plan cites as an “unnecessary burden on infrastructure.” (Int. SA Appraisal c-34).This would indicate that the margins which the plan is working to are finely balanced and the infrastructure provisions barely adequate if 1023 is acceptable but 1100 is not.</p>

In fact we have evidence that, in addition to Liberal Democrats, a body of Conservative Dacorum councillors disagree with the substance of this plan and that compared to projections by the ONS the announced housing targets are 30-43% too high even before any proper re-assessment of more considered national levelling policies has taken place. In being asked to comment on this plan at this stage are the residents of Dacorum being used as pawns in some political game to demonstrate to central Government that its planning policies are flawed ? If DBC believes that, it should have the courage to make its own direct representations, as indeed other councils are doing.

Suffice to say, this plan represents the end product of the very worst of centralised, bureaucratic, top-down policy-making which takes little account of the constraints of a particular area.

However, having been forced into commenting on this plan at this juncture we recognise that if we do not provide our comments there is a grave danger that it is pushed through indiscriminately and unmodified to the detriment of the current resident population whose views, past experience shows, have carried little weight in final outcomes. It appears that "the development industry " and surrounding councils have already had more sway than existing tax paying residents as demonstrated in the Development Strategy Topic Paper at 4.15 & 4.18.and the Adopted Local Development Scheme of July 2020.

Included files	
Title	Question: National Policy and Guidance
ID	EGS1717
Person ID	1149470
Full Name	Mrs Fiona Reavell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	Guidance has changed.
Included files	
Title	Question: National Policy and Guidance
ID	EGS1730

Person ID	1262353
Full Name	L HOUSDEN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	See attached representations - it is TTC's view that the overall strategy of directing so much growth to Tring is flawed. As currently drafted, the emerging Local Plan is not 'justified' by evidence, 'Effective', or 'Consistent with national policy'. In respect of the extensive and unnecessary Green Belt releases; potential impacts upon heritage assets, the AONB & the SAC; and the profligate use of high quality agricultural land; the emerging plan cannot be said to be in accordance with the NPPF.
Included files	Tring Town Council - Completed consultation Comments Form (Final).pdf
Title	Question: National Policy and Guidance
ID	EGS1768
Person ID	406469
Full Name	Dr Stephen Douglas
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance

ID	EGS1788
Person ID	1154047
Full Name	Brendon Sparks
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<ul style="list-style-type: none"> Finally - National Policy and Guidance – The plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development. It is difficult to understand the Council's attitude which ignores this.
Included files	
Title	Question: National Policy and Guidance
ID	EGS1824
Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTIONS NPPF comment	<p>This Plan is not consistent with the NPPF.</p> <p>a) The fails to use the latest data to calculate the Boroughs needs</p> <p>b) Without giving any justification the Plan accepts the Standard Methodology numbers as a strict target when Government has made it crystal clear that these numbers are NOT targets</p> <p>c) The Plan fails to take into account the natural constraints of the Borough, and so fails to provide protection for Green Belt as required by the NPPF</p> <p>d) No evidence is given as to the 'exceptional circumstances' to plan for building on Green Belt that passes the tests included in the NPPF.</p> <p>e) The Plan promotes sites that cannot be regarded as sustainable or well served by public transport.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS1828
Person ID	1262446
Full Name	Mr Andrew Boothby
Organisation Details	
Agent ID	1175743
Agent Full Name	Kevin Rolfe
Agent Organisation	Group Director, Development & Planning Aitchison Raffety
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>PLEASE READ PDF ATTACHMENT TO SEE IMAGES AND MAPS IN THE CONTEXT OF THE FULL RESPONSE - TEXT RESPONSE ONLY IS SHOWN BELOW</p> <p>GREEN BELT BOUNDARY -REAR OF CONISTON ROAD KINGS LANGLEY</p> <p>This submission is in relation to the position of the Green Belt boundary to the rear of houses in the lower/eastern part of Coniston Road Kings Langley.</p> <p>See proposals map extract.</p>

The boundary line, this submission refers to, is as described by DBC consultants Arups on their drawing below, as line KL.E

We do not agree with DBC's proposal to leave the GB boundary line unchanged.

The current GB boundary is an anomaly; it follows an arbitrary undefined line along a boundary that has no permanence.

The current boundary does not serve any of the 5 purposes that apply in the GB and the boundary should therefore be amended to the logical, permanent and defensible position at the end of the gardens, which are clearly all within the built up village of KL. The new boundary would follow the mature edge of the countryside.

In assessing the GB line at KL.E the consultants state in their conclusion below that "The Green Belt boundary is not demarcated by any physical features; it cuts across residential gardens.."

In their written analysis the consultants accept that para 139 of the NPPF states that "GB boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent"

So by their own analysis they have confirmed that this is not the case, and therefore the fact that they then go on to reject any change is inappropriate.

Para 139 of the NPPF also states that "they must be defensible and well justified to be maintained in the long-term, beyond the lifetime of the plan"

There is no such justification in this case.

Despite the above, the consultants propose no change, as they have stated that there are no apparent "exceptional circumstances".

We do not agree with this being required as a justification. The land is not being proposed as a housing allocation and as stated above, it is simply the case that the current boundary does not comply with Para 139 and does not fulfil any of the 5 purposes.

The consultants accept that para 134 of the NPPF states that for retention of GB land it must meet the 5 purposes.

The 5 purposes are set out below and it is totally clear that the GB in this location does not meet any of these.

If the line was moved to the correct location at the end of the gardens it would then sit rightly at the edge of the countryside and fulfill some of the criteria below.

When seeking to justify if the land meets any of the 5 purposes the consultant has looked at the existing pattern of development and whether the absence of the GB line would lead to a proliferation of householder development "in a way that would harm the permanent openness of the countryside" This is not the same as any of the 5 GB purposes so is an incorrect analysis.

In any event, a change in the boundary line as we propose, would not change anything. PD is allowed in the GB and there are already large modern ancillary structures within the GB within the rear gardens of some properties as per the images included at the end of this submission. So the boundary line change would not make any difference.

Consultants have accepted in all DBC studies that the current GB line is not in a permanent location and slices randomly through gardens at an undefined point.

All reports accept that the whole of the length of the gardens are undoubtedly within the village settlement.

DBC consultants also tested sites to the west and north of the gardens as per the plan below, for potential housing allocations.

The comments below regarding the eastern boundary of site 94, which immediately abut the subject land, make the position clear.

Site 94 above was concluded by the consultants to be potentially suitable for allocation but ultimately not carried forward.

The plan below for site 94 clearly shows the rear garden line of the Coniston road homes to the East.

As for site 88, to the north, which was also tested, the conclusion again, below, clearly accepts that the entire length of gardens are within the “built-up area” of KL.

In conclusion the current GB boundary is simply in the wrong place, it is an anomaly.

It is not permanent nor defensible.

It is within the built-up area of KL.

It does not satisfy the 5 GB purposes.

Exceptional circumstances are not required, it is not being proposed as a housing allocation, it is just in the wrong place.

The boundary should be moved to follow the permanent defensible line at the end of the gardens adjoining open countryside.

Images are included below to illustrate the above points.

VIEWS SHOWING WHERE A PERMANENT, DEFENSIBLE BOUNDARY SHOULD BE, WITH COUNTRYISDE AT REAR

(NOTE: REAR FENCE ON RHS IMAGE IS NOT ON GB BOUNDARY LINE, THE STRUCTURES & FENCE IS BEYOND THE LINE)

GREEN BELT BOUNDARY LINE IS COMPLETELY UNDEFINED

Included files

[REDACTED Andrew Boothby - C-O Agent Kevin Rolfe Aichison Rafferty.pdf](#)

Title

Question: National Policy and Guidance

ID

EGS1873

Person ID

1262495

Full Name

Jason Nell

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS1879
Person ID	1160632
Full Name	Simon Foster and Monique Bos
Organisation Details	
Agent ID	928570
Agent Full Name	Mr James Holmes
Agent Organisation	Associate Director Aitchison Raffety Ltd
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>Government policy in the NPPF seeks to protect the Green Belt from new development. The following paragraphs are of particular relevance:-</p> <p>Paragraph 133 states that the Government attaches great importance to Green Belts. 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 their permanence.</p> <p>Paragraph 136 states that once established, Green Belt boundaries should only be altered where <u>exceptional circumstances</u> are <u>fully evidenced and justified</u>. It is not considered that the Council has met this policy test. In particular, the Council should not be encouraging speculative development such as supermarkets when no clear evidence of need exists.</p>

This is not a development site. It is a Green Belt site where development is defined as inappropriate in Government policy in the NPPF.

Included files

Title Question: National Policy and Guidance

ID EGS1934

Person ID 1262553

Full Name Henry Wallis

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

**QUESTIONS NPPF
comment**

Included files

Title Question: National Policy and Guidance

ID EGS2004

Person ID 1143683

Full Name Mr Peter Brown

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

Yes

QUESTIONS NPPF comment	It represents over development of this part of West Hertfordshire.
Included files	
Title	Question: National Policy and Guidance
ID	EGS2067
Person ID	1262738
Full Name	Alan Pierce
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	I am deeply concerned that this policy is now out of line with the revised thinking in Central Government
Included files	
Title	Question: National Policy and Guidance
ID	EGS2122
Person ID	1262797
Full Name	NICK TURNER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

**QUESTIONS NPPF
comment**

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance. It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS2187

Person ID 1262762

Full Name Eric Dodman

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	It might be consistent but is not founded on local requirements and takes no account of the existing population.
Included files	
Title	Question: National Policy and Guidance
ID	EGS2210
Person ID	1262841
Full Name	Nada Ryan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS2238
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	National Policy and Guidance. Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development. No sign of levelling up the north and south of England as suggested should happen by our Prime Minister, just appears to be massive unsustainable over development in the south and loss of biodiversity and green space and farmland.
Included files	
Title	Question: National Policy and Guidance
ID	EGS2278
Person ID	1262925
Full Name	Nandipha Jordan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<ul style="list-style-type: none"> • Para 11(b) of the NPPF requires 'objectively assessed needs for housing'. The number of houses should specifically meet Dacorum's need for the full range of affordable social housing, as defined in our answer to question 1. • The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB. • Para 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap. • NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered. <p>The proposed wildlife corridors are not explicit or mapped as required by the NPPF.</p>
Included files	

Title	Question: National Policy and Guidance
ID	EGS2318
Person ID	610662
Full Name	Mr Antony Harbidge
Organisation Details	Chairman Berkhamsted Residents Action Group (BRAG)
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>For full analysis and detail BRAG refers DBC back to responses to other sections, but it is clear that this Plan is not consistent with the NPPF.</p> <ol style="list-style-type: none"> 1 The fails to use the latest data to calculate the Boroughs needs 2 Without giving any justification the Plan accepts the Standard Methodology numbers as a strict target when Government has made it crystal clear that these numbers are NOT targets 3 The Plan fails to take into account the natural constraints of the Borough, and so fails to provide protection for Green Belt as required by the NPPF 4 No evidence is given as to the '<i>exceptional circumstances</i>' to plan for building on Green Belt that passes the tests included in the NPPF. 5 The Plan promotes sites that cannot be regarded as sustainable or well served by public transport.
Included files	
Title	Question: National Policy and Guidance
ID	EGS2330
Person ID	1262984
Full Name	Deborah O'Sullivan
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The plan has failed to consider fully:</p> <p>Section 2, Achieving sustainable development, Point 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Section 3, Strategic policies, Point 20(c) of the NPPF requires ‘sufficient provision for community facilities (such as health)’ there appears to have been little assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>Section 15, Conserving and enhancing the natural environment, Point 175</p> <p>NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS2394
Person ID	1254107
Full Name	Polly Eaton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>Point 1.3.1 states “great weight should be given to outstanding or innovative designs which promote high levels of sustainability”. I do not believe that the proposal acknowledges sustainable building in any way. There is no mention of the materials for the houses, or heating methods being sustainable. I think there is a major gap between national policy and the proposal.</p>

Included files	
Title	Question: National Policy and Guidance
ID	EGS2442
Person ID	1227518
Full Name	Mr John LOWRIE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	Actually it does match up. It's such a shame that it appears to keep changing. Why are we struggling to build houses that we can't prove that people want to live here, while there are streets of empty houses in the north
Included files	
Title	Question: National Policy and Guidance
ID	EGS2471
Person ID	1262981
Full Name	Chris Mabley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	There are substantial modifications not allowed for and there is insufficient confidence that national policy can be adhered to when it comes to actual plans put forward by developers.We were told by Assistant Director Doe that policy was a matter of opinion.

Included files	
Title	Question: National Policy and Guidance
ID	EGS2478
Person ID	1263080
Full Name	Russell Emson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS2516
Person ID	1263140
Full Name	Mr B & Mrs A Goddard
Organisation Details	
Agent ID	1262938
Agent Full Name	Steven Barker
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	

Included files	
Title	Question: National Policy and Guidance
ID	EGS2529
Person ID	1263143
Full Name	Manlet Group Holdings Limited
Organisation Details	
Agent ID	1262938
Agent Full Name	Steven Barker
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS2560
Person ID	1263183
Full Name	Claire Davies
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	No, this plan isn't consistent with NPPF. The plan does not protect Green Belt, in actually prioritises it over brown field sites, many more of which look set to become available as a result of the impact of COVID.

Included files	
Title	Question: National Policy and Guidance
ID	EGS2585
Person ID	1262037
Full Name	Jason Silver
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	Need a protection of green belt sites
Included files	
Title	Question: National Policy and Guidance
ID	EGS2651
Person ID	1263231
Full Name	Mr Phil Robinson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS2662
Person ID	1263235
Full Name	Mrs Vanessa Robinson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	

* No	
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p> <p>It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS2673
Person ID	1161597
Full Name	Stuart Mears
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p> <p>It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS2682
Person ID	1263237
Full Name	Dr Alice Mears

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p> <p>It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.</p>
Included files	

Title	Question: National Policy and Guidance
ID	EGS2691
Person ID	1263240
Full Name	Stuart and Val Burnett
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p>

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS2701

Person ID 1263241

Full Name Mr Stephen Hurley

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

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With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted

in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b). Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance. It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS2712

Person ID 1263245

Full Name Mr Paul Barritt

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c). With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b). Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance. It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS2821

Person ID 1263287

Full Name Jeremy Bonnar

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c). With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield

redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS2833

Person ID 1263206

Full Name Andrew Farrow

Organisation Details Great Gaddesden Parish Council

Agent ID 1253616

Agent Full Name Andrew Farrow

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment If the 2014 ONS figures for housing need are to be used then the Plan is not consistent with NPPF s.31 which states that “all policies should be underpinned by relevant and up-to-date evidence”.

It is not clear that the NPPF requirement for the Plan to fully explore the potential to make effective use of urban land (s. 118 and s.137) before releasing Green Belt land has been met.

There is sufficient uncertainty in the evidence provided for water supply to question whether the Plan is consistent with NPPF s.170 which states that “Planning policies and decisions should contribute to and enhance the natural and local environment”

Included files

Title Question: National Policy and Guidance

ID EGS2888

Person ID 1263425

Full Name Andrew Farrow

Organisation Details Nettleden with Potten End Parish Council

Agent ID 1253616

Agent Full Name Andrew Farrow

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment

If the 2014 ONS figures for housing need are to be used then the Plan is not consistent with NPPF s.31 which states that “all policies should be underpinned by relevant and up-to-date evidence”.

It is not clear that the NPPF requirement for the Plan to fully explore the potential to make effective use of urban land (s. 118 and s.137) before releasing Green Belt land has been met.

There is sufficient uncertainty in the evidence provided for water supply to question whether the Plan is consistent with NPPF s.170 which states that “Planning policies and decisions should contribute to and enhance the natural and local environment”

Included files

Title Question: National Policy and Guidance

ID EGS2936

Person ID 1263377

Full Name Jane Messenger

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS2976
Person ID	1164709
Full Name	Dianne Pilkington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield</p>

sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS3005

Person ID 1263478

Full Name ELIZABETH RAILTON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment The framework does not support the erosion of the Green Belt in circumstances that pertain across Dacorum.

Included files	
Title	Question: National Policy and Guidance
ID	EGS3011
Person ID	1262892
Full Name	Jean Farrer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The Local Plan is not based on the latest ONS (2017) population statistics and has accepted without challenge the standard methodology for setting housing need. This the Government intended as a starting point, not a target, and with the potential loss in Dacorum of up to 850 hectares of Green Belt I believe there is room for negotiation and drawing back from this overstatement of housing need.</p> <p>The Council is failing to protect what makes Dacorum a highly desirable place to live i.e. the Green Belt around our historic towns and villages. The NPPF allows Councils to make a case for protecting the Green Belt unless there are exceptional circumstances. An overstatement of 'housing need' is not justified as an exceptional circumstance. In June 2016, the Housing Minister wrote to MPs and said that housing need alone will not change Green Belt boundaries.</p> <p>The plan has sites in Berkhamsted, Northchurch and Tring which are not sustainable. The road, lanes, canal bridges were just not built to cope with this level of housing, and, because of their historic character, cannot be widened – however much you wish it. The town centres may retain their historic appearance but they will be choked by overpopulation, pollution and traffic with this level of development.</p> <p>I ask the Council to amend the plan along more realistic lines and argue for the protection of our Green Belt</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS3015
Person ID	1261190
Full Name	Neil Harwood

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS3016
Person ID	1258924
Full Name	Natalia Maghdoori
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield</p>

redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

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Included files	
Title	Question: National Policy and Guidance
ID	EGS3024
Person ID	1263489
Full Name	Malcom & Jennifer Stodell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	

* No	
QUESTIONS NPPF comment	<p>It seems paradoxical and unacceptable that the local public is being asked to comment on Dacorum's Local Plan with it's long term and far reaching consequences, at a time when central government has now radically moved it's stance on housing targets geographically. I would suggest Dacorum needs to reconsider some of it's key decisions in view of this and at that time consult it's electorate.</p> <p>One of the Government's tickets for re-election was to rebalance the south east : north divide. It seems clear that to focus large numbers of new houses in the already overdeveloped south goes against this premise.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS3070
Person ID	1146084
Full Name	Mr Jason Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>The plan has failed to consider fully:</p> <p>Section 2, Achieving sustainable development, Point 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Section 3, Strategic policies, Point 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been little assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>Section 15, Conserving and enhancing the natural environment, Point 175</p>

NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.

Included files

Title Question: National Policy and Guidance

ID EGS3103

Person ID 1263499

Full Name Mrs Angela Burgin

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

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minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

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Included files	
Title	Question: National Policy and Guidance
ID	EGS3116
Person ID	1261485
Full Name	Douglas Adams
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS3127
Person ID	1263514

Full Name	SAM LETHEREN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

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Included files

Title Question: National Policy and Guidance

ID EGS3149

Person ID 1263526

Full Name MR NICK RIPPER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

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Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

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Included files

Title Question: National Policy and Guidance

ID EGS3172

Person ID 1263537

Full Name MRS SARAH RIPPER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* No

**QUESTIONS NPPF
comment**

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

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Included files

Title	Question: National Policy and Guidance
ID	EGS3188
Person ID	1263550
Full Name	ANNABEL FRANCIS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and</p>

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

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Included files

Title Question: National Policy and Guidance

ID EGS3248

Person ID 1263566

Full Name Frances Read

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment

Included files

Title Question: National Policy and Guidance

ID EGS3258

Person ID 1155396

Full Name Jane Hodgson

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

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Included files

Title Question: National Policy and Guidance

ID EGS3294

Person ID 1263610

Full Name BRYN HENRY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

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Included files

Title Question: National Policy and Guidance

ID EGS3307

Person ID 1263620

Full Name EMMA SIMMONDS

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* No

**QUESTIONS NPPF
comment**

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

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Included files

Title	Question: National Policy and Guidance
ID	EGS3321
Person ID	1263631
Full Name	GAVIN NICHOL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS3335

Person ID 1263643

Full Name IAN DESTE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield

sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS3417

Person ID 1263763

Full Name Adam Kindred

Organisation Details CBRE

Agent ID 1263757

Agent Full Name Adam Kindred

Agent Organisation

Yes / No No

* Yes	
* No	
QUESTIONS NPPF comment	<p>For the reasons set out in the preceding question the Draft Plan is not consistent with the NPPF. The principal areas of disagreement focus on the following paragraphs of the NPPF:</p> <ul style="list-style-type: none"> • Paragraph 60– this is clear that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The Draft Local Plan is based on a consultation version of the figure (922pa), rather than the now adopted position of 1,023pa homes. • Paragraph 11, 174(a)– both of these policies relate to avoiding significant harm on environmental resources with 174(a) specifically setting out the approach for how protected sites should be considered. The spatial strategy, through significant housing growth in Berkhamsted and Tring is not consistent with the NPPF, notably in light of the existence of alternative sites in areas located furthest away from the SSSI. • Paragraph 103 and 104– these both relate to the need to ensure that development is located in areas that can offer opportunities for sustainable development. Within the spatial strategy there is an under representation of the role that Kings Langley plays, both relative to other Large Villages and also when compared to the growth being planned for in Tring and Berkhamsted.
Included files	
Title	Question: National Policy and Guidance
ID	EGS3453
Person ID	1263124
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
QUESTIONS NPPF comment	<i>While the Local Plan uses the PPS 2019 (which is required by the NPPF) as part of its evidence base it does not follow the strategic advice and guidance offered within the strategic element of the PPS. (See our answers to Q7 above).</i>

The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

The NPPF, MHCLG, Feb 2019, Paragraph 96 states:

“Planning and policies should provide communities with the facilities and spaces to meet their needs, including new open space, sport and recreation facilities. These should take into account any local strategies, plus any deficits or surpluses.

The provision of community facilities and services should be considered at the same time as when proposals for new homes and economic uses are developed.”

Comment: The Local Plan is proposing new housing and economic siting whilst it has not fully considered where or how it will meet the need for the new sporting facilities to meet the increased demand from the new housing; or where and how new sites for these important community facilities will be provided.

Included files	
Title	Question: National Policy and Guidance
ID	EGS3472
Person ID	1159198
Full Name	Edward Hatley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	The Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS3488
Person ID	1263805

Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p><i>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</i></p> <p><i>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</i></p> <p><i>The emerging Local Plan is not 'Justified' by evidence, 'Effective', or 'Consistent with national policy'. In respect of the extensive and unnecessary Green Belt releases; potential impacts upon heritage assets, the AONB & the SAC; and the profligate use of high quality agricultural land; the emerging plan cannot be said to be in accordance with the NPPF.</i></p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS3526
Person ID	1263824
Full Name	Nichola Criddle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p><i>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</i></p>

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

The emerging Local Plan is not 'Justified' by evidence, 'Effective', or 'Consistent with national policy'. In respect of the extensive and unnecessary Green Belt releases; potential impacts upon heritage assets, the AONB & the SAC; and the profligate use of high quality agricultural land; the emerging plan cannot be said to be in accordance with the NPPF.

Included files

Title Question: National Policy and Guidance

ID EGS3565

Person ID 1263821

Full Name Anne Isherwood

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment

Included files

Title Question: National Policy and Guidance

ID EGS3623

Person ID 369415

Full Name Mr Dacorum EnvironmentalForum

Organisation Details Chair
Dacorum Environmental Forum Waste Group

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>DEF has sight of a letter from Christopher Pincher MP to Cllr. Andrew Williams that Councils do indeed have “wriggle room” to adopt lower housing numbers, but the Plan has not used this option, and its current overall tone indicates that there is no intention to do so.</p> <p>For our full response see: The attached document if you are receiving this by E-mail The link below if you are viewing this online http://dacenvforum.org.uk/ and look under "Consultations etc."</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS3639
Person ID	1263885
Full Name	Mr Neil Roberts
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p>

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS3646
Person ID	1145631
Full Name	Mr Alastair Greene
Organisation Details	Clerk Little Gaddesden Parish Council
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS3767
Person ID	1263921
Full Name	sarah diehl
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS3783
Person ID	1263939
Full Name	Mr Richard Dawkins
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>There are three areas of non-compliance with the NPPF:</p> <p>Firstly, after the Draft Local Plan went out to consultation on 27th November 2020, the government announced (Footnote 59: https://www.gov.uk/government/news/plan-to-regenerate-england-s-cities-with-new-homes) on 16th December 2020 that it will change the formula that calculates housing need with the effect of moving development away from the South East of England and greenfield sites to urban areas of the North and the Midlands (Footnote 60: https://www.housingtoday.co.uk/news/jenrick-launches-revised-housing-numbers-algorithm/5109565.article).</p> <p>Given that 5,945 (35%) of the 16,899 dwellings earmarked in the Draft Local Plan (Footnote 61: table 2 p37: Sources of Housing Land Supply, Draft Local Plan 2020-2038) are located in the Green Belt, it is almost certain that the housing need for Dacorum will be revised downwards once the Government has updated its formula.</p> <p>Section 13 of the National Planning Policy Framework 2019 (NPPF) (Footnote 62: www.gov.uk/government/publications/national-planning-policy-framework--2 para 137, p41.) states that a strategic policy-making authority needs to “demonstrate that it has examined fully all other reasonable options for meeting its identified need for development” before it concludes “that exceptional circumstances exist to justify changes to the Green Belt boundaries”. Preparation of a Local Plan in itself does not amount to exceptional circumstances.</p> <p>If the draft local plan is not updated to reflect the expected reduced housing need, the Borough Council will be unable to comply with section 13 of the NPPF as it will be releasing green belt land in excess of the housing need (or, moreover, paragraph 35 of the NPPF (Footnote 63: plans are only ‘sound’ if they are “b) justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”)).</p> <p>Indeed, the draft local plan itself recognises “that there are uncertainties over using this as our housing figure, particularly as there may be a further refinement to the process of calculating housing need and other matters that may need to be factored in. We will keep this issue under review as we progress to the next stage of the Plan and make any necessary adjustments when we know more” (Footnote 64: Paragraph 7.5 p35: Draft Local Plan).</p> <p>Therefore, Dacorum Borough Council should first update the Draft Local Plan to match the updated housing need and only commence the Regulation 19 Consultation once that exercise is complete.</p>

Secondly, paragraphs 102 and 103 of the National Planning & Policy Framework 2019 outline that the environmental impacts of traffic should be taken into account including appropriate opportunities to avoid any adverse effects, and authorities should seek to reduce congestion and emissions to improve air quality and public health. The location of Bank Mill Lane makes it inevitable that congestion will increase, in particular along London Road/High Street, where the shallow speed bumps and many incidences of on-street parking already block the carriageway, creating informal chicanes, and probably increase congestion and worsen air quality (Footnote 65 para 5.23, p75, Berkhamsted and Tring Sustainable Transport Study, November 2020). Making this situation worse would run counter to the NPPF and would be particularly damaging to quality of life given the location of two schools.

Thirdly, in the central part of the Bank Mill Lane site, there is a high risk of flooding as noted in the response to question 5. The south west Hertfordshire level 1 strategic flood risk assessment of October 2018 makes clear (Footnote 66: para 13.1.1, 105, SW Hertfordshire Level 1 SFRA October 2018.) that “the NPPF supports a risk-based and sequential approach to development [...] so that development is located in the lowest flood risk areas where possible; it is recommended that this approach is adopted for all future developments within South West Hertfordshire. New development [...] of land should wherever possible seek opportunities to reduce overall level of flood risk”. If the Bank Mill Lane site were to go ahead, it would be in contravention to this approach as supported by the NPPF.

Included files

Title Question: National Policy and Guidance

ID EGS3871

Person ID 1263989

Full Name Lauren Ashton

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment

National Policy and Guidance – Plan isn’t consistent with NPPF because it doesn’t offer the protection for Green Belt that the NPPF demands and these plans prioritise Green Belt development over brownfield/urban development.

Included files	
Title	Question: National Policy and Guidance
ID	EGS3895
Person ID	488516
Full Name	mr hugh siegle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The Plan ignores the protection given to the Green Belt by the NPPF and does not prove the "exceptional circumstances" necessary for existing boundaries to be adjusted.
Included files	
Title	Question: National Policy and Guidance
ID	EGS3903
Person ID	1263998
Full Name	Mrs Lara Dixon
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTIONS NPPF comment	<p>Section 3, Strategic policies, Point 20(c) of the NPPF requires ' sufficient provision for community facilities (such as health) ' there appears to have been little assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>Section 15, Conserving and enhancing the natural environment, Point 175 NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS3904
Person ID	1263924
Full Name	Susan Moore
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>We have an obligation to redress inequality in the UK. Many towns in the North, South West and along our coasts, that have suffered years of neglect, should have funds diverted from the South East building projects in order to attract young people and small businesses to affordable, desirable, refurbished properties, so that communities can once again flourish and thrive.</p> <p>An overpopulated South East alongside deprived empty shopping centres in overlooked towns up and down the country is an irresponsible response to the future prosperity of the UK.</p> <p>Progress should be measured by putting the well- being of people living alongside nature in decent, regenerated towns and villages with character that build vibrant communities across the UK.</p>

We need to remind councils and politicians about their obligation to 'Level Up'; to provide a better environment for all across our country; to sustainably transform existing housing, shops and business premises and bring an end to out of town New Build.

It is time to be innovative and make better things happen for everyone now.

Included files

Title Question: National Policy and Guidance

ID EGS3955

Person ID 1264025

Full Name Caroline Sherwen

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTIONS NPPF comment Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.

Included files

Title Question: National Policy and Guidance

ID EGS3968

Person ID 1263016

Full Name Joanna Brown

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	No
QUESTIONS NPPF comment	The Local Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands, and it prioritises Green Belt development over brownfield/urban development. The NPPF states that Green Belt boundaries can only be amended in exceptional circumstances. Please explain what these "exceptional circumstances" are. I cannot see them in the consultation documents. The existence of need alone, in this case need for more homes, does NOT meet the exceptional circumstances test, as stated in legal cases which clarify that there are a number of factors that councils must consider before exceptional circumstances are determined.
Included files	
Title	Question: National Policy and Guidance
ID	EGS3995
Person ID	1261840
Full Name	Rachel Heath
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS4007
Person ID	1263249
Full Name	Claire Whitely
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of paragraph 137 of the framework and cannot meet the definition needed to justify development on the green belt. There is a clear requirement to examine all reasonable options for meeting the identified need before using green belt land.</p> <p>There is a lack of identification of brownfield sites outside of Hemel Hempsted, in areas such as Tring. This dramatically weakens any possible justification of the use of green belt.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS4038
Person ID	1261199
Full Name	Will Bentley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The National Planning Policy Framework which allows local authorities to restrict the scale of development due to, amongst other things, the impact on the Green Belt and AONB. There is little credible evidence that Dacorum have considered this given the high numbers/size of greenbelt land earmarked for development - especially when the numbers of houses being proposed are way higher than the latest ONS estimates.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS4129
Person ID	1264070

Full Name	Michelle Carnegie
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS4139
Person ID	1264064
Full Name	Melanie Ingram
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The scale of the target for housing in Dacorum raised within this Local Plan is a 25% growth (16,596 houses) in housing, there is no evidence to support this 25% growth, especially considering there is a 9% (5,950 houses) population growth forecast by the ONS in Dacorum for the same period.</p> <p>Additionally this development plan is using a local housing target number that is based on a 300,000 national figure, a number which has a bias towards building in the South and on green belt areas.</p> <p>Whereas government are briefing to the press (via the consultation of the white paper and various 'controlled' leaks) that the national figure should be 170,000-200,000 once it is aligned to ONS figures (which government recommended), and</p>

should be biased towards building in the North to aid economic levelling up. The white paper also advises building should focus on brownfield sites and away from places like Dacorum which are covered with 50% green belt.

Finally none of the above calculations take into account the recent change in business working practice (working from home) which may reduce the volume in demand of commercial properties leaving some areas with an increased amount of brownfield sites.

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS4228

Person ID 1264301

Full Name James Stringer

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p>

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS4250

Person ID 1264320

Full Name JACKIE GLOSSOP

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport” . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS4274
Person ID	1261915
Full Name	Eleanor Lovett
Organisation Details	Landhold Capital
Agent ID	1261754
Agent Full Name	Eleanor Lovett
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	As illustrated in the representations made to other questions in this consultation, Landhold Capital is concerned that there are many examples of inconstancy between the Council’s emerging Plan and the provisions of the Framework. Whilst these are referred to in respect of the relevant question, a brief summary of the relevant paragraphs and the issues raised is provided below.

- **Paragraph 11**– requires strategic policies to provide for the objectively assessed need for housing and other uses as a minimum.
- **Paragraph 16** –in particular the requirements for plans to be positively prepared in a way that is aspirational but deliverable, and to contain policies that are clearly written and ambiguous.
- **Paragraph 35** –the tests of soundness and the requirement for the plan to be positively prepared and meet OAN as a minimum; justified, taking into account reasonable alternatives; effective and deliverable over the plan period; and consistent with the provisions of national policy.
- **Paragraph 59** – to support the Government’s objective of significantly boosting the supply of homes.
- **Paragraph 77** – the consideration of whether market housing would help to facilitate the delivery of affordable housing on rural exception sites.
- **Paragraph 123**– requiring plans to contain policies to optimise the use of land and the use of minimum density standards.
- **Paragraph 136** - where it is proposed that changes to Green Belt boundaries will be made through neighbourhood plans, strategic policies must establish the need for such changes.
- **Paragraph 138** – when it has been concluded that it is necessary to release land from the Green Belt, first consideration should be given to land which has been previously developed and/or is well served by public transport.

Included files

Title Question: National Policy and Guidance

ID EGS4290

Person ID 1264269

Full Name Paul de Hoest

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

Numerous local groups have commented on this consultation including Berkhamsted Residents Action Group (BRAG), Berkhamsted Citizens Association, CPRE, Chiltern Society, Berkhamsted Town Council, Dacorum Green Party, Berkhamsted and Tring Labour Party to name a few. **I agree with the stance taken by all of these groups.** The fact that all these (and there will be others) are providing the same substantive message from the local population to you

should demonstrate that these proposals do not have the support of the people. I do not propose to add to your reading burden by rehashing all of their points but I do make the following observations.

The NPPF is very clear that simply to meet a housing target is not a sufficient reason to release Green Belt. There is nothing in this plan or supporting documents that qualifies as "exceptional circumstances" that could justify such large scale release of Green Belt lands.

Included files

Title Question: National Policy and Guidance

ID EGS4302

Person ID 1207786

Full Name Anne Foster

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTIONS NPPF comment No
No, the Plan is not consistent with the NPPF as despite the positive wording throughout the plan. It does not take realistic account of such constraints as Green Belt and the AONB etc, in accepting the proposed housing numbers, and in site selection. No supporting evidence of the exceptional circumstances required to justify building on Greenbelt Land is provided

Included files

Title Question: National Policy and Guidance

ID EGS4369

Person ID 1262873

Full Name Donna Atkinson

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>Para 11(b) of the NPPF requires ‘objectively assessed needs for housing’. The number of houses should specifically meet Dacorum’s need for the full range of affordable social housing, as defined in our answer to question 1. The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Para 20(c) of the NPPF requires ‘sufficient provision for community facilities (such as health)’ there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered. The proposed wildlife corridors are not explicit or mapped as required by the NPPF.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS4482
Person ID	1264316
Full Name	Melanie Turner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>The Plan isn’t consistent with NPPF because it doesn’t offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.</p> <p>The Berkhamsted Delivery Strategy is clearly developer led and offers no protection to Green Belt or infrastructure improvements for issues that already exist.</p>

Included files	
Title	Question: National Policy and Guidance
ID	EGS4551
Person ID	1261836
Full Name	Richard Sutton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>My family and I moved to Dacorum in 2018 to settle in Berkhamsted for at least the next 25 years. Over this time, we look forward to developing ever stronger links throughout the community and watching our young children grow to adulthood. As such, we have a vested interest in seeing the Borough grow in a way that works for all its citizens – both existing and new.</p> <p>Against this backdrop, I wish to formally state my strong objections to the ‘Dacorum Local Plan (2020-2038) Emerging Strategy for Growth’. The evidence suggests that, if this plan is approved, your personal legacy will be of considerably worsening towns and communities within the Borough. For new residents moving to the area and for those already here. For all ages. And for all financial situations. I suspect you don’t want to be remembered after you leave this office as the person who caused such damage to an area. So, I ask you to fundamentally rethink.</p> <p>Due to the COVID-19 constraints on travel and mingling for the past year, my experience, and hence prime objection, focuses on the portions of the Local Plan relating to developments in the Berkhamsted area.</p> <p>To summarise:</p> <ol style="list-style-type: none"> 1. Flawed modelling of number and type of housing required would fail to meet the actual needs of the voters moving into the area, whilst disrupting those already here far more than is needed. 2. Inadequate commitment to transport infrastructure needs to accommodate the changes proposed would result in a legacy of decades of traffic congestion for voters in Dacorum and visitors to the area. 3. Insufficient provision of water supply, wastewater disposal and other infrastructure would leave households with shortages and damage the local water table, with knock-on considerations around subsidence and environmental impact. 4. Unworkable assumptions around public transport and foot / bike journeys would see considerable increase to carbon emissions in the Borough and considerable travel delays around vital transport hotspots (town centres, schools, rail stations, etc.).

5. The above worsening of conditions for the new and existing voters in the area also comes with an ecological cost due to the loss of green belt. If green belt is to be repurposed, it must be done in a way that makes the greatest positive impact for the current and future residents of Berkhamsted. This plan wastes that sacrifice.

These are fundamental flaws in the strategy underpinning the 'Dacorum Local Plan (2020-2038) Emerging Strategy for Growth'. As such, this plan should be rejected outright, and a new plan drawn up that addresses the actual needs of the area for today and the long-term success of the Borough.

These points are expanded below.

Incorrect Assumptions for Housing Provision

Whilst accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, the scale of proposed development in Dacorum is out of balance with the long-term needs.

The Local Plan does not take account of National Planning Policy Framework (NPPF), paragraph 11, footnote 6, which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and Area of Outstanding Natural Beauty (AONB).

Recent Government guidance on calculating housing need has been, at best, confusing. The algorithm for calculating housing need that has been used by the Council is a flawed means to calculate the housing needs of the Borough, based on old data.

The correct calculation of the housing needs in Dacorum should be based on the most recent and relevant data, which is currently the 2018 based Office for National Statistics (ONS) projections. Instead, the Local Plan is based on calculations using outdated 2014 based ONS data, which results in a significant overestimate of housing needs.

I note that on 16 December 2020 the UK Government published its response to the local housing need proposals on the consultation on changes to the current planning system. This sets out important changes to the standard method which has been amended so that the 20 most populated cities and urban centres in England (none of which are in Dacorum) see their need uplifted by 35%. The Government also said:

"More broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We (Government) should be clear that meeting housing need is never a reason to cause unacceptable harm to such places. ...

Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt."

Failure to Provide Adequate Supportive Infrastructure

Looking at the proposed developments on Green Belt land, there is insufficient consideration in the Local Plan for the provision of new infrastructure or upgrading the current infrastructure to support the scale of the proposed developments.

Taking a specific example of transportation, consider area 'Bk01 - South of Berkhamsted'. This proposes adding 850 residential units with 2 ways out of the development:

1. Emerging immediately next to a secondary school of over 1300 pupils; and
2. Passing two primary schools on a single, narrow residential road with a 10% gradient and car parking on both sides.

These roads are heavily congested during normal times with the current population – the road by the secondary school backing up during school run times to the main A41 route into and out of the town. Adding 850 households of cars will lead to transport paralysis for the new residents, the homes already in the area, pupils of the schools and people trying to access Berkhamsted from the A41 during peak times.

Similarly, increasing the number of dwelling by over 1,800 in the Berkhamsted area will result in a considerable increase in vehicular traffic through the centre of the town – a route that is already heavily congested at peak times at the A4251 / A416 junction and along the High Street. This is due to the historic layout of the town along a valley with steep sides meaning there are only these two roads into and through the town.

For the increase in population proposed in the Local Plan, there would need to be a considerable extra investment in road widening, traffic flow control measures and new roads to bypass the congestion points inherent with a medieval market town situated in a steep river valley.

Impact on Green Belt and Other Designated Land

The Local Plan states that a key objective is “minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB”. This strategic principle is then violated by the declared mission to provide at least 100% of the Council’s self-assessed housing need, regardless of the impact on the environment, infrastructure, climate change and biodiversity.

Noting that 85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns AONB, this approach comes at considerable environmental cost.

As such, the Local Plan must be fundamentally reworked to avoid such contradictions in strategic goals and principles.

You are now faced with a personal choice.

Whether to be remembered for taking the easy choice and sticking to an inherently flawed plan that will deeply damage the Borough of Dacorum forever – your lasting legacy – or to take the brave decision and do what is right – to reject the current plan and come back with one based on the actual needs of the current and future voters and households of Dacorum.

Included files	
Title	Question: National Policy and Guidance
ID	EGS4593
Person ID	1145918

Full Name	Mr Richard Tregoning
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS4610
Person ID	1262255
Full Name	AJ W
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	These plans do not offer growth that is in line with guidance from the NPPF in that it does not offer protection to greenbelt land and that it prioritises development of greenbelt land over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS4626
Person ID	1264481
Full Name	KEITH AND LEAH RYDING / BREZOVEC-RYDING

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>National Policy and Guidance</p> <p>That the Council have ignored National Planning Policy contained in the NPPF and statements by Ministers including the PM that Green Belt should not be developed except in 'exceptional circumstances'. There is no declaration by the DBC what is an exceptional circumstance and how such would be justified with regard to the planned developments.</p> <p>Further, The Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS4656
Person ID	1264487
Full Name	Mrs Sue Edmanson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>I consider that there is insufficient evidence to show the need for 25% growth in housing in Dacorum, and in particular with reference to the proposals for a 55% growth in Tring. I have concerns over the disproportionate allocation of Green Belt Land and understanding of how much the council and developers will be transparent in the issues of addressing the use of the highest possible sustainable and carbon neutral methods with the building and surrounding areas to ensure carbon reduction and impact on climate change. With regard to Tring I would like to see more details surrounding the</p>

provision of schools, infrastructure and also leisure facilities and also issues regarding Health Care. Concern regarding potential impact on local surrounding areas of Outstanding Natural Beauty and areas of Scientific Interest.

Included files

Title Question: National Policy and Guidance

ID EGS4697

Person ID 1145431

Full Name mr David van Rhee

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS4739
Person ID	1263004
Full Name	Jill Townsend
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance

ID	EGS4741
Person ID	1264485
Full Name	Charlotte Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	The plan is not consistent with NPPF as it does not offer the protection for green belt that the NPPF demands and prioritised green belt development over brown field/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS4845
Person ID	1264531
Full Name	PAUL KENT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p>

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS4846

Person ID 1257705

Full Name Mark Barfield

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p> <p>It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS4857
Person ID	1264475

Full Name	Simon Davies
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The language is too nebulous, and subject to interpretation.
Included files	
Title	Question: National Policy and Guidance
ID	EGS4876
Person ID	1264533
Full Name	MAURICE OKEEFFE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p>

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS4895

Person ID 1150594

Full Name Catherine and Mark Richardson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>We do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plans expectation of delivery of 5,945 homes within the Green Belt has not been justified.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS4913
Person ID	1264537
Full Name	KATHERINE COURTNEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p>

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS4918
Person ID	1264536
Full Name	Mr George Harvey
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p> <p>It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS4931
Person ID	1264540
Full Name	JOSEPH DAWSON

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS4940

Person ID 1260771

Full Name JAMIE BELL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy "optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards

in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b). Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance. It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS4958

Person ID 1264546

Full Name Dr Calvin Veeroo

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c). With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield

sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS4984
Person ID	1264548
Full Name	Mrs Sasha Godfrey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p>

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS4998
Person ID	1264549
Full Name	Mrs Kate Carter
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

**QUESTIONS NPPF
comment**

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “ all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “ optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport” . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’ s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS5044

Person ID 1264557

Full Name Natalie Crane

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	No
QUESTIONS NPPF comment	The Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS5085
Person ID	1264258
Full Name	Fintan FitzPatrick
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>Framework (NPPF) and supporting guidance?</p> <p>Para 11(b) of the NPPF requires 'objectively assessed needs for housing'. The number of houses should specifically meet Dacorum's need for the full range of affordable social housing, as defined in my answer to question 1.</p> <p>The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Para 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.</p> <p>The proposed wildlife corridors are not explicit or mapped as required by the NPPF.</p>
Included files	
Title	Question: National Policy and Guidance

ID	EGS5128
Person ID	1250013
Full Name	Mrs Nikki Bugden
Organisation Details	Clerk Nash Mills Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>In the main yes, although we have a couple of comments:</p> <p>The NPPF emphasises the importance of green belt and its use only in “exceptional circumstances”. The data used to calculate housing and the availability of all brownfield sites (including those related to office space post pandemic) should be explored before resorting to this route.</p> <p>While sustainable transport is prioritised, the NPPF states that planning should offer a “genuine choice of transport modes” and that “local car ownership levels” should be taken into account. Given the most recent census data and our proximity to major road networks, we feel it should be recognised that owning a car (even if not used for all journeys) will still be a choice for many people.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS5180
Person ID	1264462
Full Name	Penny Clifton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
QUESTIONS NPPF comment	<p>This Plan is not consistent with the NPPF.</p> <p>It fails to use the latest data to calculate Dacorum's needs. It accepts the Standard Methodology numbers as a target when government itself has said these numbers are not targets.</p> <p>The Plan does not take into account the many natural constraints of the area, and fails to protect the green belt as required; in fact a staggeringly large proportion of sites are greenfield or greenbelt. There is no argument or evidence that there are 'exceptional circumstances' that mean the green belt should be used.</p> <p>The Plan promotes sites that cannot be regarded as sustainable or well served by public transport. The so-called sustainability of this plan is wishful thinking.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS5247
Person ID	1264608
Full Name	Nicola Beadle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS5284
Person ID	1175740

Full Name	Berkhamsted Schools Group
Organisation Details	The Berkhamsted Schools Group
Agent ID	1175743
Agent Full Name	Kevin Rolfe
Agent Organisation	Group Director, Development & Planning Aitchison Raffety
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p><i>Yes, subject to comments below</i></p> <p>We will seek to support DBC with their interpretation of national planning guidance where possible. We trust that DBC will continue to plan for a level of growth that is consistent with the NPPF and the crux of government housing policy which is to provide adequate housing.</p> <p>We appreciate that DBC will need to have regard to the very recent government response to the consultation on housing numbers. BSG continue to support DBC's objectives in adopting a balanced approach which weighs the need for additional housing and investment, with the desire to retain the unique character of Berkhamsted.</p> <p>We do of course understand that there are strong local feelings regarding development per se and green belt releases in particular. Given the potential moving goal posts around housing numbers and wider planning reforms generally, there has been some evidence of other Councils delaying or amending local plans, often many times.</p> <p>We support DBC and their officers for pressing ahead with a plan despite these uncertainties and trust that DBC can continue to do so. A delayed and/or challenged plan is of no benefit to anyone.</p> <p>As stated throughout our submission, we believe that regardless of the final level of growth approved for Berkhamsted that the proposed housing site at Haslam Field BK03 is the most appropriate of any for a green belt release. The BSG wishes to continue to improve its excellent education offering and its extensive investment programme in the local economy. An allocation of site BK03 with a relocation to Cy04 will consolidate that process and be of great mutual benefit to the local community as a whole.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS5315
Person ID	1264532
Full Name	Robert Clarke

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS5344
Person ID	1264616
Full Name	Philip Daw
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	The Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development. The Berkhamsted Delivery Strategy is clearly developer led and offers no protection to Green Belt or infrastructure improvements for issues that already exist.
Included files	
Title	Question: National Policy and Guidance
ID	EGS5354
Person ID	1262731

Full Name	Julie Battersby
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>I believe the Local Plan mis-applies the exceptional need test to support housing and development expansion that is not required by the government or even local people to the extent claimed if recalculated based on the 2018 ONS population dataset without the proposed new national method to calculate need and taking into account recent reports of depopulation. The evidence for this is very clearly laid out in the CPRE Herts report - see Evidence. <i>The focus of the NPPF is to preserve Green Belt land and other sites of historical, ecological or environmental significance and yet the Council chooses to disregard that steer.</i> The Local Plan does not have all the necessary assessments and remedial plans in place to enable a fully considered view of the impact of a development (eg in relation to supply of water to protect the chalk streams and enable recovery) and presumes a positive outcome. It is therefore biased in favour of the development and mis-directs the public. Classifying undeveloped peripheral sites in Green Belt land as 'urban' is presumptive and also could be considered prejudicial to the outcome of the consultation. It assumes in advance: a) that development on our Green Belt sites has already taken places following demonstration that exceptional circumstances apply (unsound on both counts); and b) that the local people currently regard their Green Belt sites as 'urban' (very unlikely – most people regard farmland or pasture surrounded by hedgerows and lanes as rural or semi-rural).</p> <p>I have not had time to prepare a full answer to this question due to the short consultation period, but there are relevant comments in other sections that I trust the Council will take account of.</p>
Included files	Evidence - CPRE Herts Assessment of Housing Need.docx
Title	Question: National Policy and Guidance
ID	EGS5383
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS5580
Person ID	1264491
Full Name	Paul Wade
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	NPPF guidance on Green belt has not been observed
Included files	
Title	Question: National Policy and Guidance
ID	EGS5590
Person ID	1264657
Full Name	Amanda Hutchinson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>No account has been taken of paragraph 11, footnote 6, which allows the development to be restricted because of other constraints, including the impact on the green belt and AONB.</p> <p>The policy is not based on the most up to date government data (the 2018 National Office for Statistics projections) and has consequently overestimated the requirement for new housing in the borough.</p> <p>The policy fails to give sufficient weight to environmental considerations, as required by law. Carbon plans must be integral to development plans.</p> <p>The plan fails to take account of topographical constraints and promotes the use of sites not served by public transport and which cannot sensibly be regarded as sustainable.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS5651
Person ID	1264689
Full Name	Philip Hobden
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS5715
Person ID	1262957
Full Name	Gregory Hukins

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS5760
Person ID	1263239
Full Name	Robert Farrer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The Local Plan is based on 3 yr old data and flawed assumptions about population growth and housing need.</p> <p>There is a gaping inconsistency in the document between the fine words in defence of the existing Green Belt and the colossal sacrifice of Green Belt land proposed here. The NPPF aims to protect Green Belt, the Local Plan would turn small market towns into vast conurbations which will ruin the special aesthetic benefits of these rolling Chilterns Hills. Many of these are listed as AONB. The NPPF requires authorities to argue 'exceptional circumstances' before building on the Green Belt. The Housing Minister is quoted as saying that housing targets alone were not to be regarded as exceptional circumstances. DBC is not using the opportunity which the NPPF offers to reduce the housing target.</p>
Included files	
Title	Question: National Policy and Guidance

ID	EGS5786
Person ID	1264741
Full Name	pete
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Nearly all development proposed will be on Greenbelt. – this is <i>against</i> Government policy. • The land between Shootersway and the A41 has always been considered as the “Green Lung” for Berkhamsted – absorbing vehicle emissions from the A41. Traffic has increased significantly in recent years. <u>A green buffer is needed.</u> • They should look at further Brownfield sites – as they are required to do.
Included files	
Title	Question: National Policy and Guidance
ID	EGS5802
Person ID	1144878
Full Name	Mr Peter Moore
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	No comment.
Included files	

Title	Question: National Policy and Guidance
ID	EGS5813
Person ID	1264751
Full Name	Simon Strong
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The Local Plan fails to demonstrate the 'exceptional circumstances' which the NPPF requires before Green Belt can be used for development. I believe that the opportunity for use of brownfield sites has not been fully explored.
Included files	

Title	Question: National Policy and Guidance
ID	EGS5840
Person ID	1263561
Full Name	Alexander Bhinder
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	Unfortunately, I do. I jst do not think it reasonable.
Included files	

Title	Question: National Policy and Guidance
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ID	EGS5896
Person ID	1264761
Full Name	Sarah Durant
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>In this plan, thousands of new homes are simply bolted onto the perimeters of our existing towns over green belt land with inadequate thought to the pressures on water supplies, traffic needs, medical facilities, education, recreation, biodiversity, recycling centres and employment needs. There is little sustainability around the construction nor the preserving of our heritage about this plan.</p> <p>The plan has fundamental conflicts with stated government policy around green spaces, nature recovery and sustainability.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS5940
Person ID	1264752
Full Name	Chris Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Clearly not something I can agree with, given comments and evidence provided earlier.

Included files	
Title	Question: National Policy and Guidance
ID	EGS5942
Person ID	1261255
Full Name	Sarah Lightfoot
Organisation Details	
Agent ID	1261248
Agent Full Name	Sarah LIGHTFOOT
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>Many of my responses in other sections have illustrated that I do not consider tht the Plan is consistent with the NPPF. The Plan fails to take into account the natural constraints of the Borough, and so fails to provide protection for Green Belt as required by the NPPF.</p> <p>The data used to calculate the Boroughs needs is out of date</p> <p>DBC accepts the Standard Methodology numbers as a strict target - Government has made it absolutely clear that these numbers are NOT targets</p> <p>There is no evidence presented in the Plan to explain or justify the 'exceptional circumstances' for building on Green Belt that passes the tests included in the NPPF.</p> <p>The Plan promotes sites that cannot be regarded as sustainable or well served by public transport.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS5946
Person ID	1264785
Full Name	Thomas Lloyd-Evans
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS5957
Person ID	1262737
Full Name	Andrew Cassels
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS5962
Person ID	1258646
Full Name	Jane Timmis
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Once again the NPPF states that the Green Belt should only be encroached on in exceptional circumstances. I would argue that those circumstances do not exist while the current housing need is at least 40% less than the numbers quoted.
Included files	
Title	Question: National Policy and Guidance
ID	EGS5981
Person ID	1151388
Full Name	Mrs Aileen MCVEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether</p>

minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b). Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance. It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS6013
Person ID	1264809
Full Name	Sue Selfe
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield</p>

sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS6030
Person ID	1264822
Full Name	JULES GARNER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTIONS NPPF comment	The plan does not consider Section 3, Strategic policies, Point 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' - where is that reflected in the plan? Again this seems to have been omitted Section 15, Conserving and enhancing the natural environment, Point 175 This requires development on Green Belt to achieve net environmental gain - how is this being delivered?
Included files	
Title	Question: National Policy and Guidance
ID	EGS6129
Person ID	1264797
Full Name	Robert Diehl
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The plan is not consistent with the NPPF because it doesn't offer the protection for the Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development
Included files	
Title	Question: National Policy and Guidance
ID	EGS6150
Person ID	1264324
Full Name	David Wells
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTIONS NPPF comment	I understand government policy has changed in regards to housing, choosing instead to focus on a regeneration of the Midlands and the North of England and the employment and industries of those regions. Further to this, they have chosen to focus development of housing on brownfield land and in urban areas. With the so called "mutant algorithm", as it became known, now abandoned, there is no impetus for large amounts of further construction in the South East or Dacorum more specifically, especially in Green Belt areas. Please see this article in Housing Today for further details: https://www.housingtoday.co.uk/news/jenrick-launches-revised-housing-numbers-algorithm/5109565.article
Included files	
Title	Question: National Policy and Guidance
ID	EGS6297
Person ID	1264834
Full Name	Ilina Jha
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	There's a lack of protection for the Green Belt, and there's a lack of evidence given for the 'exceptional circumstances' cited as reason for building on the Green Belt.
Included files	
Title	Question: National Policy and Guidance
ID	EGS6373
Person ID	1264946
Full Name	Shaun Pope
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS6428
Person ID	1264750
Full Name	Neil Joyce
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	There is a definite north-south divide which the national plan needs to overcome and address. The pandemic has changed the demands on housing, businesses and travel.
Included files	
Title	Question: National Policy and Guidance
ID	EGS6534
Person ID	1264916
Full Name	Kathryn Spall
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The NPPF states that the Green Belt should only be built on in "exceptional circumstances". This plan provides no reasoning for destroying the Green Belt in Berkhamsted or Tring and must therefore be contrary to the national guidance.
Included files	
Title	Question: National Policy and Guidance
ID	EGS6545
Person ID	1263462
Full Name	Bourne End
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The plan shows no evidence of DBC using the available option of reducing its housing target, for example on the grounds of protecting its green belt percentages to maintain the openness of its countryside for agricultural function and as a buffer between communities.
Included files	
Title	Question: National Policy and Guidance
ID	EGS6594
Person ID	1264970
Full Name	Frankie Mitchell
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS6643
Person ID	1265007
Full Name	Duncan Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	The Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS6723
Person ID	1264923
Full Name	Ken Douglas
Organisation Details	Secretary TRING IN TRANSITION
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>For Tring, at least, Plan does not appear to with the NPPF in many areas</p> <ul style="list-style-type: none"> • Para 11(b) of NPPF requires ‘... <i>objectively assessed needs for housing...</i>’ <p>The number of houses proposed for Tring is in excess of the number calculated in the September 2020 South West Herts Housing Needs Assessment prepared by GL Hearn.</p> <p>No objectively assessed reason(s) for this given in the Plan.</p> <ul style="list-style-type: none"> • Para 20(c) of NPPF requires ‘... <i>sufficient provision for community facilities (such as health...)</i>’ <p>Regarding the combined impact of Tr01, Tr02, Tr03 population increase in Tring, there appears to have been no assessment of the impact on capacity of existing primary care provision in Tring, nor time-scaled provision for additional primary healthcare facility to bridge the gap.</p> <ul style="list-style-type: none"> • Para 20(d) of the NPPF requires ‘... <i>sufficient provision for conservation and enhancement of the natural environment including landscapes and green infrastructure...</i>’ <p>At Tr01, Tr02 and Tr03, whilst the existence of existing and historic field boundary patterns is recognised, there is nothing about their conservation. Many of the hedges in all three areas are over 600 years old as determined by the standard method of number of woody species per 30 metres of hedge length, and as such should be protected by law.</p> <ul style="list-style-type: none"> • Paras 24-27 of NPPF require cooperation across administrative boundaries. <p>Regarding Tr01 and proposal for warehousing, there is no evidence of any discussion with the adjoining Aylesbury Vale District Council regarding the option of using existing industrial/employment land in AVDC at College Road North just 3 miles west of Tring for that warehousing.</p> <p>Taking that option could generate much more employment in Tring than warehousing by, for example, freeing up land for a residential home.</p> <ul style="list-style-type: none"> • The provisions for green/wildlife corridors (especially in Tr01, 02 and 03) are confused and inadequately defined. In particular, the corridors are poorly linked together and do not explicitly protect the hedgerows (including Marshcroft Lane) and the surrounding countryside that are a key part of the character of the area and vital to local biodiversity. <p>Overall, the Plan for Tring falls short of NPPF para 147, and paras 99/100.</p> <ul style="list-style-type: none"> • NPPF requires that development on Green Belt land achieves net environmental gain (NPPF para 72c) and is mitigated by compensating development of surrounding natural spaces; there is no evidence that this has been adequately considered. Although considered for NT Ashridge, it is not considered regarding the key ‘honey pots’ of Tring Park, Stubbings Wood or College Lake.

- Housing densities on Tr01, Tr02 and Tr03 are not stated, despite seemingly being required by NPPF para 123b.
- To meet NFFP requirements, 'wildlife corridors' need to be made explicit and mapped (NPPF para174), along with their linkage to existing wild/natural areas. This has not been done in the Plan.
- Policy SP23. There is no timescale given for any of the numbers (overall or by site) for the proposed housing sites in Tring, and yet these must exist as the overall growth for Dacorum is profiled by year. Why is this not stated, as required by NPPF para73?

The Plan does not comply with the NPPF in several respects, as identified below.

These comments relate specifically to proposals regarding Tring. There may be other parts of the Plan which are also non-compliant with the NPPF.

The Plan could be at risk of being determined as being 'unsound' for this reason.

Included files

Title Question: National Policy and Guidance

ID EGS6840

Person ID 1265036

Full Name Tom Burrows

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

Included files

Title Question: National Policy and Guidance

ID EGS6871

Person ID 1265079

Full Name Daryl Rattigna

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	No - not enough work has gone into brown field sites, eg the berkahmsted call for sites refers to the Old Mill pub, but that is not included in any of the analysis. this reflects a lack of consideration of brownfield sites across the entire piece
Included files	
Title	Question: National Policy and Guidance
ID	EGS6964
Person ID	1265059
Full Name	Paul Austin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS6979
Person ID	1265063
Full Name	Richard Scott
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	The plan is inconsistent with NPPF because it doesn't offer the protection for the Green Belt that NPPF demands and prioritises Green Belt development over brownfield/urban development
Included files	
Title	Question: National Policy and Guidance
ID	EGS6994
Person ID	1265081
Full Name	Caitlin Neale
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	The plan isn;t consistent with NPPF because it doesn't offer the protection for greenbelt that the NPPF demands. It prioritises greenbelt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS7005
Person ID	1263321
Full Name	TSEL Secretary TSEL
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>Tornadoes appreciates the scale of the task DBC has in producing a Local Plan and reasonably expects that DBC has the expertise to ensure that the Plans it develops are consistent with the National Planning Policy Framework.</p> <p>Tornadoes primary concern then it that the DBC Local Plan is developed with the needs of the existing community of Tring first generally and the young people of Tring in particular.</p> <p>The NPPF, MHCLG, Feb 2019, Paragraph 96 states:</p> <p>“Planning and policies should provide communities with the facilities and spaces to meet their needs, including new open space, sport and recreation facilities. These should take into account any local strategies, plus any deficits or surpluses. The provision of community facilities and services should be considered at the same time as when proposals for new homes and economic uses are developed.”</p> <p>So, as the Local Plan is proposing new housing and economic siting whilst it has not fully considered where or how it will meet the need for the new sporting facilities to meet the increased demand from the new housing or where and how new sites for these important community facilities will be provided, Tornadoes must conclude that at present the Plan is not consistent with the national Planning Policy Framework.</p> <p>Given the close proximity Tring enjoys to both Buckinghamshire & Bedfordshire and its remoteness from the rest of Hertfordshire, for Tornadoes, there is thus far, no evidence that DBC is taking into account the massive developments currently underway and proposed in: Aston Clinton, Western Turville and Halton/Wendover, Buckinghamshire, along with the developments already underway in and around Pitstone, Bedfordshire.</p> <p>DBC do not appear to have proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The Local Plan currently therefore fails to accord with National Policy and Guidance.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS7016
Person ID	1265096
Full Name	David Ball
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>Whilst the Plan may be consistent with the policy and guidance at the present time, there are a number of instances where the Courts have noted that the Policies are out of date and should be updated. Indeed, the White Paper consultation is even recognised in the Introduction to this plan. Further, in the latest consultation to be issued by The Ministry, they note that a further review of the Framework is likely to be required. To set the precedent for such large housing developments against a moving background is not appropriate.</p> <p>The assumed allocation of new build housing to Dacorum is disproportionate to its size and could potentially adversely impact its character. The allocation further ignores two very fundamental changes to the need for housing that underpin this:</p> <p>1) the move towards remote working, which has been accelerate by COVID-19, will reduce the need for the London Commuter Belt as less people need to travel to the city. Those that do are expected to do so less frequently and are likely to be prepared to undertake longer commutes; and</p> <p>2) the "Leveling Up Agenda", supported by all parties, seeks to rebalance the prosperity of the nation by shifting the balance away from London towards the Midlands and the North. Housing allocations should follow this drive so as not to create future deficits in the northern parts of the country.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS7020
Person ID	1263500
Full Name	Jessica Haigh
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
QUESTIONS NPPF comment	National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development..
Included files	
Title	Question: National Policy and Guidance
ID	EGS7104
Person ID	1264453
Full Name	Fiona Hinton
Organisation Details	Myself
Agent ID	1264426
Agent Full Name	Fiona Hinton
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The strategy proposed for Berkhamsted is centred around building huge numbers of houses on Greenbelt land. This goes completely against NPPF principles of protecting Greenbelt land, thus is inconsistent with national policy and guidance.
Included files	
Title	Question: National Policy and Guidance
ID	EGS7154
Person ID	1265074
Full Name	Stephen Wilson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTIONS NPPF comment	Some of the policies seem to be at odds with the NPPF
Included files	
Title	Question: National Policy and Guidance
ID	EGS7164
Person ID	1265133
Full Name	Sarah Storey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	There is no justification for using out of date ONS housing estimates in this plan. Dacorum residents deserve better representation in ensuring development is sustainable, both in terms of infrastructure and the natural environment.
Included files	
Title	Question: National Policy and Guidance
ID	EGS7252
Person ID	1265129
Full Name	Karen Foxwell-Moss
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTIONS NPPF comment	As I have stated in Comment 23, the plan isn't consistent with NPPF because it prioritises Green Belt development over brownfield/urban development. It is absurd that such major changes to beautiful market towns are even being considered during a global pandemic, when it is unclear what post-pandemic working practices, and the very obviously linked housing location decisions will be. I urge you to challenge the targets, rethink the strategy to prioritise development on areas of land which are not designated Green Belt sites.
Included files	
Title	Question: National Policy and Guidance
ID	EGS7259
Person ID	1264956
Full Name	Caroline Heard
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
QUESTIONS NPPF comment	Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS7276
Person ID	1261685
Full Name	Ian Edwards
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS7296
Person ID	1265179
Full Name	JANE DAWSON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p>

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS7317
Person ID	1265182
Full Name	JAMES NODDER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	

QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS7334
Person ID	864107
Full Name	Mr Antony Hetherington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “ all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “ optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a</p>

significant uplift in minimum density standards in town and city centres and other locations well served by public transport” . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS7345
Person ID	1207259
Full Name	Mr Graham Bright
Organisation Details	Chairman Grove Fields Resident Association
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS7412

Person ID 1265377

Full Name PHILIP MOORES

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development " before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport " . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

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It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan 's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS7425

Person ID 1265380

Full Name JON WRIGHT

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

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Included files

Title Question: National Policy and Guidance

ID EGS7437

Person ID 1265381

Full Name DR SUE DAVEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

**QUESTIONS NPPF
comment**

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Included files

Title Question: National Policy and Guidance

ID EGS7584

Person ID	1265614
Full Name	JACKIE BARKER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “ all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “ optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport” . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

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Included files

Title Question: National Policy and Guidance

ID EGS7614

Person ID 1143218

Full Name Mr Terry Cartmell

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment

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Included files

Title Question: National Policy and Guidance

ID EGS7625

Person ID 1207710

Full Name Penny Bennetts

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No	
QUESTIONS NPPF comment	I don't know
Included files	
Title	Question: National Policy and Guidance
ID	EGS7643
Person ID	1265748
Full Name	Mr Roger McVey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted</p>

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Included files

Title Question: National Policy and Guidance

ID EGS7658

Person ID 1265752

Full Name Mrs Flora Moores

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “ all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c). With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

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Included files

Title Question: National Policy and Guidance

ID EGS7677

Person ID 1261784

Full Name Nigel Vanner

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

QUESTIONS NPPF comment

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Included files	
Title	Question: National Policy and Guidance
ID	EGS7691
Person ID	1265757
Full Name	JENNIFER GAIL FREER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	

**QUESTIONS NPPF
comment**

NPPF S11 —

- There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.
- There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

- It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.
- The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.
- This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.
- The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.
- It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.
- The council should insist that the government uses the most accurate, and therefore up-to- date information to calculate the housing target — not just to change the statistics used to suit their aims.
- Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt
- There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites
- The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt
- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
- it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments

- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 a) to check the unrestricted sprawl of large built-up areas;
- 3 b) to prevent neighbouring towns merging into one another;
- 4 c) to assist in safeguarding the countryside from encroachment;
- 5 d) to preserve the setting and special character of historic towns; and
- 6 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.
- Social housing need in Dacorum
- Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.
- Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

- We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities
- There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.
- The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.
- Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

- The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS7702

Person ID 1265614

Full Name JACKIE BARKER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
 * Yes
 * No

No

QUESTIONS NPPF comment

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Included files

Title Question: National Policy and Guidance

ID EGS7717

Person ID 1265765

Full Name Miss Inma Rodriguez

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

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Included files	
Title	Question: National Policy and Guidance
ID	EGS7744
Person ID	1265778
Full Name	Councillor Lara Pringle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	

**QUESTIONS NPPF
comment**

NPPF S11 —

— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.

— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.

— The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.

— This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.

— The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.

— It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.

— The council should insist that the government uses the most accurate, and therefore up-to-date information to calculate the housing target — not just to change the statistics used to suit their aims.

— Using out-of-date statistics means that the projections are not an 'objectively assessed need'.

— There is insufficient justification for building on the Green Belt

— There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites

— The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

— Not enough thought has been given to options for housing that is not on the Green Belt

— The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)

— it is reasonable to project a higher amount of windfall given the rules on town centre and office developments

— the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

134. Green Belt serves five purposes:

a) to check the unrestricted sprawl of large built-up areas;

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

NPPF Section 134

— Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

— There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files	
Title	Question: National Policy and Guidance
ID	EGS7788
Person ID	1265904
Full Name	Mrs Alex Brown
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>I feel the Council have not only ignored the National Planning Policy Framework (NPPF) - PARAGRAPH 11, FOOTNOTE 6 - which allows local authorities to RESTRICT the scale of development due to other planning constraints - including impacts on the Green Belt and AONB - but I feel they have gone against the NPPF totally.</p> <p>Once this green and pleasant land is gone, there is no turning back. There is no bringing it back. It will be gone forever. We are in the midst of a mass global environmental disaster which we are struggling to contain and slow down let alone reverse. Any plans the council are putting forward to provide additional housing MUST and I mean MUST guarantee the protection and safety of green belt land, natural habitats - and MUST create additional ones. The current plans do not do this - in fact - they do the exact opposite.</p> <p>The areas of Green Belt land also provides massive protection to the town by absorbing pollution including noise pollution - from the fast and very busy A41. The land also provides a glorious natural environment to exercise in - it is safe and healthy - never more needed than during the last few months. And what of the farming land that will be lost? The proposed area in the South East of Berkhamsted is abundantly farmed - it must be kept that way - not used for property development.</p> <p>The Dacorum plan is in total and utter contradiction to National Government Policy. Dacorum MUST retract this plan and reconsider it to look for alternatives on existing Brownfield sites - and there are a stack of those all over Dacorum - and the post Covid world will likely mean more Brownfield will become available too.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS7806
Person ID	1148738
Full Name	Ian and Claire Field
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTIONS NPPF comment	National Policy and Guidance – the Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS7821
Person ID	1265909
Full Name	Peter Evans
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>I agree with the following statements within the Grove Fields Residents Association response to the Local Plan:</p> <p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy "optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted</p>

in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b). Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance. It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS7842

Person ID 1265915

Full Name Mr Stephen Trueman

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c). With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy "optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS7843
Person ID	1265916
Full Name	Susan Edwards
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	I object to the proposed local plan for Dacorum, which has been based on incorrect statistics. With regard to BK06, West Berkhamsted, although it is actually Northchurch, I realise that more houses need to be built in the area but too many houses, 200 of the wrong type are proposed and the only people that will benefit are the developers selling off the green belt. What we need in this area is good affordable social housing using brown-field sites, not using green belt land. There has been too much green belt land built on already in this area and the local roads cannot cope with the extra traffic.

I would like to draw your attention to The National Planning Policy Framework set out by the government in 2019, Chapter 13 Protecting Green Belt Land. It states that:

133. The Government attaches great importance to Green Belts. 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 their permanence.

134. Green Belt serves five purposes:

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

Why is the National Planning Policy Framework being ignored? Surely it was put in place to protect the green belt? How much work has been undertaken to identify brown field sites that could be used in the area instead of green belt land?

We should be protecting our green belt for future generations, not destroying it.

Included files	
Title	Question: National Policy and Guidance
ID	EGS7874
Person ID	1265975
Full Name	Clare Smith
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTIONS NPPF comment	(27) National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development
Included files	
Title	Question: National Policy and Guidance
ID	EGS7876
Person ID	1145502
Full Name	Mr Guy Dawkins
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	b. Between the government's objectives and guidance and the proposed plan: i. The government (in December 2020) is condemnatory about "consultation responses which did not fully recognise that the standard method does not present a 'target' in plan making but instead provides a starting point for determining the level of need for housing in an area. It is only after this, alongside what constraints areas face, such as Green Belt, and the land that is actually available for development that the decision on how many homes should be planned for is made." What the Local Plan proposes is in direct conflict with these guidelines. ii. The Local Plan has an objective of building 16,600 home locally by 2038 but it is unclear where this figure comes from. The ONS has revised downwards its estimate of housing requirements locally but the Local Plan does not reflect this. If the government has kept up-to-date why cannot the council?
Included files	
Title	Question: National Policy and Guidance
ID	EGS7892
Person ID	1265985

Full Name	PAUL ELLERAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>NPPF S11 —</p> <p>— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.</p> <p>— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.</p> <p>NPPF - S60</p> <p>— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.</p> <p>— The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.</p> <p>— This government policy could be characterised as saying, ‘If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.’ It is irrational to risk the Green Belt on such an ill-conceived policy.</p> <p>— The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a ‘substantial change’ between the most recent projections and the old ones.</p> <p>— It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.</p> <p>— The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target — not just to change the statistics used to suit their aims.</p> <p>— Using out-of-date statistics means that the projections are not an ‘objectively assessed need’. — There is insufficient justification for building on the Green Belt</p> <p>— There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites</p> <p>— The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.</p>

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

— Not enough thought has been given to options for housing that is not on the Green Belt

— The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)

— it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments

— the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt According to the NPPF:

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NPPF Section 134

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61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

— There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable

Included files

Title	Question: National Policy and Guidance
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ID	EGS7908
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Person ID	1265991
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Full Name	NICHOLAS MORGAN
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Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>NPPF S11 — — There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting. — There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.</p> <p>NPPF - S60 — It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics. — The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans. — This government policy could be characterised as saying, ‘If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.’ It is irrational to risk the Green Belt on such an ill-conceived policy. — The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a ‘substantial change’ between the most recent projections and the old ones. — It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed. — The council should insist that the government uses the most accurate, and therefore up-to- date information to calculate the housing target — not just to change the statistics used to suit their aims. — Using out-of-date statistics means that the projections are not an ‘objectively assessed need’. — There is insufficient justification for building on the Green Belt — There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites — The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage. — The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.</p> <p>NPPF Section 137 — Not enough thought has been given to options for housing that is not on the Green Belt</p>

— The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided) — it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments — the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt According to the NPPF:

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NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities — There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

Included files	
Title	Question: National Policy and Guidance
ID	EGS7942
Person ID	1265997
Full Name	ROSE SHERIDAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No

* Yes
* No

**QUESTIONS NPPF
comment**

NPPF S11 —

— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.
— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.
— The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.
— This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.
— The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.
— It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.
— The council should insist that the government uses the most accurate, and therefore up-to-date information to calculate the housing target — not just to change the statistics used to suit their aims.
— Using out-of-date statistics means that the projections are not an 'objectively assessed need'.
— There is insufficient justification for building on the Green Belt
— There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites
— The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.
— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt
- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
- it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments
- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt

According to the NPPF:

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- b) to prevent neighbouring towns merging into one another;
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NPPF Section 134

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NPPF Section 61

- We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities
- There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

Included files

Title Question: National Policy and Guidance

ID EGS7959

Person ID	1266002
Full Name	ROXANNE RANSLEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The plan is not consistent with national policies relating to green belt as no justification shown in evidence. Also queries relating to chalk streams and the availability of water.
Included files	
Title	Question: National Policy and Guidance
ID	EGS7975
Person ID	1266006
Full Name	SUE ELLERAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

**QUESTIONS NPPF
comment**

NPPF S11 —

— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.

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NPPF - S60

— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.

— The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.

— This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.

— The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.

— It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.

— The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target — not just to change the statistics used to suit their aims.

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— it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments — the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt According to the NPPF:

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NPPF Section 134

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— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS8001

Person ID 1266015

Full Name SOPHIE WHITTON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* No

**QUESTIONS NPPF
comment**

NPPF S11

a) There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.

b) There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

a) It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics. The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans. This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.

b) The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones. It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed. The council should insist that the government uses the most accurate, and therefore up-to-date information to calculate the housing target — not just to change the statistics used to suit their aims.

c) Using out-of-date statistics means that the projections are not an 'objectively assessed need'. There is insufficient justification for building on the Green Belt — There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites.

d) The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage. The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

a) Not enough thought has been given to options for housing that is not on the Green Belt — The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided) — it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments — the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt According to the NPPF: 134. Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

a) Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic. Social housing need in Dacorum Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings. 61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

a) We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities.

b) There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need. — The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing. — The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents. — Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA. The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS8031

Person ID 1266031

Full Name EAMONN BRENNAN

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

QUESTIONS NPPF comment	<p>Green belt grab insupportable and unjustifiable</p> <p>If implemented, these damaging proposals would result in the loss of a massive 850 hectares of the Green Belt, the wider countryside and urban green space for development.</p> <p>There is ample basis for arguing that land constraints such as Green Belt preservation may be used as a justification for lowering housing numbers as derived from central government calculations. The Council should challenge both the August and December 2020 housing targets which are clearly not in line with the intent of Government policy before proceeding further with the Local Plan.</p> <p>Furthermore, it is not clear that the It is not clear that the NPPF requirement for the Plan to fully explore the potential to make effective use of urban land (s. 118 and s.137) before releasing Green Belt land has been met.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS8049
Person ID	1152837
Full Name	Suzanne Jannese
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS8074
Person ID	1266048
Full Name	RACHEL MORGAN
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>NPPF S11 —</p> <ul style="list-style-type: none"> • There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting. • There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need. <p>NPPF - S60</p> <ul style="list-style-type: none"> • It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics. • The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans. • This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy. • The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones. • It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed. • The council should insist that the government uses the most accurate, and therefore up-to- date information to calculate the housing target — not just to change the statistics used to suit their aims. • Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt — There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites — The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage. • The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt
- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided) — it is reasonable to project a higher amount of windfall given that rules on town centre and office developments — the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt According to the NPPF:
 - 1 Green Belt serves five purposes:
 - 2 a) to check the unrestricted sprawl of large built-up areas;
 - 3 b) to prevent neighbouring towns merging into one another;
 - 4 c) to assist in safeguarding the countryside from encroachment;
 - 5 d) to preserve the setting and special character of historic towns; and
 - 6 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.
- Social housing need in Dacorum
- Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.
- Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

- We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities — There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.
- The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

- Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.
- The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS8092

Person ID 1266049

Full Name Mike Plowman

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.

Included files

Title Question: National Policy and Guidance

ID EGS8234

Person ID 1266154

Full Name Iain Smith

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes

* No	
QUESTIONS NPPF comment	(27): National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS8246
Person ID	1266155
Full Name	Annabel Carroll
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>NPPF S11 —</p> <p>— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.</p> <p>— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.</p> <p>NPPF - S60</p> <p>— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.</p> <p>— The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.</p> <p>— This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.</p> <p>— The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.</p>

— It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.

— The council should insist that the government uses the most accurate, and therefore up-to-date information to calculate the housing target — not just to change the statistics used to suit their aims.

— Using out-of-date statistics means that the projections are not an ‘objectively assessed need’. — There is insufficient justification for building on the Green Belt — There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites — The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

— Not enough thought has been given to options for housing that is not on the Green Belt

— The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided) — it is reasonable to project a higher amount of windfall given that rules on town centre and office developments — the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 a) to check the unrestricted sprawl of large built-up areas;
- 3 b) to prevent neighbouring towns merging into one another;
- 4 c) to assist in safeguarding the countryside from encroachment;
- 5 d) to preserve the setting and special character of historic towns; and
- 6 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

— Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities — There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS8319

Person ID 1266175

Full Name Anna Foster

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment 8/ Do you think the plan is consistent with National Planning Policy Framework (NPPF) and supporting guidance?

NPPF S11 — There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting. There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

Included files

Title Question: National Policy and Guidance

ID	EGS8418
Person ID	1266234
Full Name	LUCY DUGDALE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>> 8/ Do you think the plan is consistent with National Planning Policy Framework (NPPF) and supporting guidance?</p> <p>> NPPF S11 —</p> <p>> — There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.</p> <p>> — There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.</p> <p>> NPPF - S60</p> <p>> — It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.</p> <p>> — The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.</p> <p>> — This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.</p> <p>> — The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.</p> <p>> — It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.</p> <p>> — The council should insist that the government uses the most accurate, and therefore up-to- date information to calculate the housing target — not just to change the statistics used to suit their aims.</p> <p>> — Using out-of-date statistics means that the projections are not an</p>

- > 'objectively assessed need'. — There is insufficient justification for
- > building on the Green Belt — There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites — The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.
- > — The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.
- > NPPF Section 137
- > — Not enough thought has been given to options for housing that is not
- > on the Green Belt
- >
- > — The estimation of windfall development is too low - evidence of
- > recent years suggests a higher amount (346 per year rather than the
- > 133.8 provided) — it is reasonable to project a higher amount of
- > windfall given that rules on town centre and office developments — the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt According to the NPPF:
- > 134. Green Belt serves five purposes:
- > a) to check the unrestricted sprawl of large built-up areas;
- > b) to prevent neighbouring towns merging into one another;
- > c) to assist in safeguarding the countryside from encroachment;
- > d) to preserve the setting and special character of historic towns;
- > and
- > e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- > NPPF Section 134
- > — Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.
- > Social housing need in Dacorum
- > Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

> 61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

> NPPF Section 61

> — We need the right houses, in the right places for local people — the

> proposed plan seems more likely to meet the need of developers than the local communities — There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

> — The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

> — The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

> — Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

> — The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files	
Title	Question: National Policy and Guidance
ID	EGS8451
Person ID	1266276
Full Name	BARBARA ANSCOMBE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS8476

Person ID 495878

Full Name Ms Anna Hanson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The plan has failed to consider fully:</p> <p>Section 2, Achieving sustainable development, Point 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Section 3, Strategic policies, Point 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been little assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>Section 15, Conserving and enhancing the natural environment, Point 175</p> <p>NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS8486
Person ID	1266302
Full Name	Gareth Garner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The plan does not consider</p> <p>Section 3, Strategic policies, Point 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' - where is that reflected in the plan? Again this seems to have been ommitted</p> <p>Section 15, Conserving and enhancing the natural environment, Point 175</p> <p>This requires development on Green Belt to achieve net environmental gain - how is this being delivered?</p>
Included files	

Title	Question: National Policy and Guidance
ID	EGS8503
Person ID	1266311
Full Name	Dr Gwynneth Down
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>I agree with the following statements within the Grove Fields Residents Association response to the Local Plan:</p> <p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p>

Included files	
Title	Question: National Policy and Guidance
ID	EGS8517
Person ID	1265044
Full Name	Joseph Price
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS8556
Person ID	211354
Full Name	Mrs Laura Sanderson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	No. It concentrates development in the South East where there is already too much housing, traffic and concentration of population with the resulting problems of water resources, and infrastructure deficiencies as I have previously stated. The pressing national requirement is for levelling up. DBC's plans do just the opposite. There should be greater housing

density in other parts of the country to encourage the movement of populations to more peripheral areas resulting in their regeneration.

Included files

Title Question: National Policy and Guidance

ID EGS8580

Person ID 1266567

Full Name CAROLINE SMALES

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

No
National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.

Included files

Title Question: National Policy and Guidance

ID EGS8623

Person ID 1266595

Full Name SHARON MACARTHUR-POWELL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

No

**QUESTIONS NPPF
comment**

NPPF S11 —

— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.

— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.

— The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.

— This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.

— The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.

— It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.

— The council should insist that the government uses the most accurate, and therefore up-to- date information to calculate the housing target — not just to change the statistics used to suit their aims.

— Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt — There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites

— The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

— Not enough thought has been given to options for housing that is not on the Green Belt

— The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided) — it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments — the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt According to the NPPF:

134. Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

— Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities — There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS8633

Person ID 1266604

Full Name SEB BELOE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

**QUESTIONS NPPF
comment**

NPPF S11 —

— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.

— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.

— The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.

— This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.

— The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.

— It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.

— The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target — not just to change the statistics used to suit their aims.

— Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt

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NPPF Section 137

— Not enough thought has been given to options for housing that is not on the Green Belt

— The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)

— it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments

— the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt

According to the NPPF:

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NPPF Section 134

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NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

— There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS8647

Person ID 1266607

Full Name RACHEL POWELL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>8/ Do you think the plan is consistent with National Planning Policy Framework (NPPF) and supporting guidance? NPPF S11 —</p> <p>— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.</p> <p>— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need. NPPF - S60</p> <p>— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.</p> <p>— The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.</p> <p>— This government policy could be characterised as saying, ‘If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.’ It is irrational to risk the Green Belt on such an ill-conceived policy.</p> <p>— The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a ‘substantial change’ between the most recent projections and the old ones.</p> <p>— It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.</p> <p>— The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target — not just to change the statistics used to suit their aims.</p> <p>— Using out-of-date statistics means that the projections are not an ‘objectively assessed need’. — There is insufficient justification for building on the Green Belt — There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites</p> <p>— The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.</p> <p>— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.</p> <p>NPPF Section 137</p> <p>— Not enough thought has been given to options for housing that is not on the Green Belt — The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)</p> <p>— it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments — the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt According to the NPPF:</p>

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 b) to prevent neighbouring towns merging into one another;
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NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities — There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

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— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS8664

Person ID 1248896

Full Name Ashleigh Genco

Organisation Details Harrow Estates plc

Agent ID 1258542

Agent Full Name	Samantha Ryan
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>Harrow agrees that the draft Growth Plan has been prepared in accordance with the NPPF and supporting guidance; it contains numerous cross-references to the NPPF explaining the links and context to support, inter alia, the development strategy, identification of strategic priorities and policies.</p> <p>Sustainable Development The draft plan is consistent with these policies and principles of the NPPF, and sets out an objective of achieving sustainable development by balancing net benefits to the three key dimensions of economic, social and environmental value. In order to achieve this, the plan recognises that the development needs of the borough can only be met by releasing some land from the Green Belt.</p> <p>Exceptional Circumstances for Green Belt Release The Council has produced significant evidence to demonstrate that it has explored all reasonable alternatives, as required by paragraph 137 of NPPF, leading to the conclusion that exceptional circumstances exist to justify changes to Green Belt boundaries. That evidence:</p> <ul style="list-style-type: none"> • Confirms that maximum use will be made of suitable brownfield sites and underutilised land (Urban Capacity Study) • Aims to optimise the density of development in appropriate locations, in particular Hemel Hempstead town centre, but also other urban locations (); and • Has been informed by discussions with neighbouring authorities, none of whom are able to accommodate any of the borough's development needs and are, in fact, looking to Dacorum to assist them in meeting their own needs <p>Having identified that exceptional circumstances do exist, the evidence base also clearly sets out the process that the Council has undertaken to identifying appropriate sites for Green Belt release, including 3 Green Belt Studies, Settlement Hierarchy Study, Sustainability Appraisal, and the Berkhamsted - Tring Transport Corridor Study. In accordance with paragraph 138 of NPPF, those studies give first consideration to land that is well-served by public transport. The analysis and evidence base clearly supports the allocation of land east of Tring as a strategic growth area which meets the following NPPF criteria; it:</p> <ul style="list-style-type: none"> • Is a sustainable expansion Tring • Is in a location that is well-served by public transport • Does not encroach into the Chilterns AONB • Has clearly defined physical boundaries that are readily recognisable and permanent, that will not need to be altered at the end of the plan period; and • Offers opportunities for compensatory improvements to the environmental quality and accessibility remaining Green Belt land

Housing Requirement
 Finally, Harrow would highlight draft policy SP2 which sets out a housing target of 16,596 homes (minimum) over the plan period. This figure was calculated in accordance with the revised Standard Methodology set out by Government in September 2020 which indicated that the borough should aim to provided 923 dwellings per annum. Since the draft plan was prepared, Government has issued a revised Standard Methodology that now sets a target of 1022 dwellings per annum for Dacorum. Harrow notes that this would result in an increase of c.1800 additional homes over the plan period which should be reflected in the Submitted Plan and increase the urgency to identify deliverable sites to ensure the 5YHLS is met.

Included files

Title Question: National Policy and Guidance

ID EGS8665

Person ID 1248896

Full Name Ashleigh Genco

Organisation Details Harrow Estates plc

Agent ID 1258542

Agent Full Name Samantha Ryan

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment
 Housing Requirement
 Finally, Harrow would highlight draft policy SP2 which sets out a housing target of 16,596 homes (minimum) over the plan period. This figure was calculated in accordance with the revised Standard Methodology set out by Government in September 2020 which indicated that the borough should aim to provided 923 dwellings per annum. Since the draft plan was prepared, Government has issued a revised Standard Methodology that now sets a target of 1022 dwellings per annum for Dacorum. Harrow notes that this would result in an increase of c.1800 additional homes over the plan period which should be reflected in the Submitted Plan and increase the urgency to identify deliverable sites to ensure the 5YHLS is met.

Included files

Title Question: National Policy and Guidance

ID EGS8738

Person ID	1266752
Full Name	Jayne Spademan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Furthermore, I reference section (27) National Policy and Guidance – The Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS8743
Person ID	1266755
Full Name	Philip Spademan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Furthermore, I reference section (27) National Policy and Guidance – The Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance

ID	EGS8802
Person ID	1261814
Full Name	Liz Uttley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>No, in particular, the housing target figure, which does not reflect an actual objectively assessed need (as per the usual understanding of these words), has been met in these proposals without due consideration to contradicting rules and guidance. Whilst planning is a balance, undue import has been placed on meeting this target, which is arbitrary, and too little consideration has been given to protections for the green belt and AoNB.</p> <p>Objectively Assessed Need</p> <p>The National Planning Policy Framework requires that all planning authorities prepare Local Plans to provide housing which meets their objectively assessed need.</p> <p>1 <i>Plans and decisions should apply a presumption in favour of sustainable development.</i></p> <p><i>For plan-making this means that:</i></p> <p><i>(a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;</i></p> <p><i>(b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas 5 , unless:</i></p> <p><i>(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 6 ; or</i></p> <p><i>(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.</i></p> <p>NPPF section 11</p>

Section 60 of the NPPF states that the housing need is calculated using the standard method. However, the standard method has changed during the course of this consultation.

- 1 *To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.*

NPPF section 60

In November 2020 Dacorum had a standard method 'housing target' of 922 dwellings per year. This was based on the most recent (2018) Office for National Statistics ('ONS') housing need projections, (355 per year averaged over the next ten years for Dacorum). The standard method algorithm then used housing affordability, and change in housing affordability in the last ten years to adjust this number upward. For Dacorum, the adjustment resulted in a multiplier applied to the ONS projected need of 2.6, and overall housing target of 922 dwellings per year.

In December 2020, Government announced that it would no longer be using this method to calculate the housing target and that it would revert to an earlier affordability algorithm. This algorithm limited the uplift from ONS figures to 1.4 x ONS figures (this cap was applied nationally). With the latest ONS figures suggesting that Dacorum would need 355 dwellings per year this would provide a housing need figure of around 500 dwellings per annum. However, rather than use the latest projections, Government announced that it would instead revert to the 2014 projections.

'We will continue to use the 2014-based household projections. The government has carefully considered whether to use the 2018-based household projections and has concluded that, due to the substantial change in the distribution of housing need that would arise as a result, in the interests of stability for local planning and for local communities, it will continue to expect only the use of the 2014-based projections.'

Government response to the local housing need proposals in 'Changes to the current planning system'

Since the latest housing need projections for Dacorum are around half the 2014 ones (355 vs 730) these out of date 2014 projections results in a 'housing target' figure for Dacorum of 1023 dwellings per year. It is specifically stated that

the reason for using the old projections is because there is a 'substantial change' between the old projections and the most recent ones. On top of this, recent evidence suggests that, if anything, the population increases expected will suffer a further down turn from the 2018 projections, at least in the short term ('UK population in biggest fall since Second World War' Telegraph 14 January 2021)

Therefore, it is self-evident that the housing target produced by the standard method cannot be accurately described as an objectively assessed need.

We urge the Council to request of Government, that the best information available be used to calculate our housing target. For example, the most recent ONS figures, and the standard method (which limits uplift to a multiplier of 1.4).

If Government does not agree to alter the Standard Method across the country to reflect more recent trends, the NPPF section 60 allows for planning authorities to set their own housing need under 'exceptional circumstances'.

It cannot be said that a target figure set by using the 2014 projections (which the Government has acknowledged are 'substantially' different to the latest projections) can be described as an 'objectively assessed need'. On top of this, providing for over double the actual required need would fundamentally fly against the UK's 2050 net zero commitment, and the requirement to 'support the transition to a low carbon economy' laid out in the NPPF. These two facts combined provide an exceptional circumstance to apply an alternative approach to calculating the housing need.

Therefore, DBC should use the latest housing projections, along with the original standard method to calculate its housing need, and update this local plan to provide for approximately 9,000 homes over 18 years.

Protected areas

If the Council does not decide to challenge the housing target provided by MHCLG, it is clear from the NPPF and the recent release from MHCLG that this target is considered only a starting point.

11 b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

- 1 *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*

- 1 *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

NPPF section 11

‘Many respondents to the consultation were concerned that the ‘targets’ provided by the standard method were not appropriate for individual local authority areas. Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt.’

Government response to the local housing need proposals in ‘Changes to the current planning system’

It is also worth noting that the reasons given by MHCLG for rejecting the complex housing algorithm (which for Dacorum gave a target figure of 2.6 x the ONS projected housing need) focused on the pressure on rural areas and Green belt.

‘In particular, we heard that too much strain was being put on our rural areas and not enough focus was on the renewal of our towns and cities.’

‘in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.’

Government response to the local housing need proposals in ‘Changes to the current planning system’

Whilst ‘unacceptable harm’ is not defined here, any definition which did not include the complete removal of land from greenbelt for housing, would be nonsensical. In the emerging local plan, which uses the figure of 922 dwellings per year, it is proposed that over 750 hectares of Green belt be released and allocated for housing. If the figure of 1023 dwellings

per year were used, it can only be assumed that pressure on green belt would be even greater. Great import is attached to preserving Greenbelt in the NPPF.

- 1 *The Government attaches great importance to Green Belts. 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 their permanence.*

NPPF section 133

It is also clear from the NPPF that the release of green belt can only be considered in ‘exceptional circumstances’.

- 1 *Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.*

NPPF Section 136

Meeting a housing target which cannot be accurately described as an ‘objectively assessed need’ does not qualify as an ‘exceptional circumstance’ in which Green belt may be released.

Furthermore, even where exceptional circumstances do apply, green belt may only be released as a last resort.

- 1 *Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*
 - 2 *a) makes as much use as possible of suitable brownfield sites and under utilised land;*
 - 3 *b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*

- 4 *c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

NPPF Section 137

It does not appear that all other options for housing have been appropriately considered in this local plan. For example, the windfall figure which is provided for in this plan is 133.8 per year. In the last fourteen years the windfall figure has been 306.2 per year on average (346 per year over the last five years). The figure for this plan period is therefore far lower than could be reasonably expected.

On top of this, permitted development rules have been widened significantly, and now include the potential to increase the height of buildings, adding flats on top of blocks of flats and adding flats on top of shops. This will likely mean that windfall figures will if anything, increase. The pandemic is expected to cause a shift away from office space for businesses in favour of more flexible working practices and this is expected to free up more brown field space within towns all over the country, thereby taking pressure off green field and green belt sites.

According to the NPPF:

- 1 *Green Belt serves five purposes:*
- 2 *a) to check the unrestricted sprawl of large built-up areas;*
- 3 *b) to prevent neighbouring towns merging into one another;*
- 4 *c) to assist in safeguarding the countryside from encroachment;*
- 5 *d) to preserve the setting and special character of historic towns; and*
- 6 *e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

NPPF Section 134

Releasing the amount of Green belt proposed, particularly since it is not needed, will prevent essential regeneration of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 *Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).*

NPPF Section 61

There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have asked for it. This need is not being met adequately through this plan. The Local Housing Needs Assessment ('LHNA') for South West Herts estimated that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing. Whilst this figure may also be reduced to a certain extent by the expected decrease in growth which has caused the ONS projections for our area to reduce from 730 to 355 dwellings per year, the current need is large, and requires positive steps to meet it.

It is our view that the Local Plan does not include sufficient allocations for affordable, or in particular social housing for the needs of Dacorum residents. Of the 922 dwellings proposed per year only 70 per year are expected to be social housing, as compared to the need for 315 social dwellings per year from the LHNA. We would like to see a third of housing delivered in Dacorum be social rented housing. A large proportion of the housing envisioned in this plan will not be affordable for our residents, but is rather aimed at London commuters, and this will do nothing to improve the affordability of housing in Dacorum.

Included files	
Title	Question: National Policy and Guidance
ID	EGS8839
Person ID	1158356
Full Name	Colin Blundel
Organisation Details	Planning Officer Chiltern Society
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Our main concern is whether the removal of land from the Green Belt for new development demonstrates the exceptional circumstances required by the NPPF. This is covered in more detail above. Also, the Plan does not appear to address footnote 6 of paragraph 11, which enables housing numbers to be reduced where there would be a detrimental impact on the Green Belt and/or AONB.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9107
Person ID	1267074
Full Name	Joanne Howe
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	(27) National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9168
Person ID	211352
Full Name	Mr Andrew Sanderson
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	No. It concentrates development in the South East where there is already too much housing, traffic and concentration of population with the resulting problems of water resources, and infrastructure deficiencies as I have previously stated. The pressing national requirement is for levelling up. DBC's plans do just the opposite. There should be greater housing density in other parts of the country to encourage the movement of populations to more peripheral areas resulting in their regeneration.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9214
Person ID	1267203
Full Name	Ms Eileen Martin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	Question 8: Do you think the Plan is consistent with the National Planning Policy Framework (NPPF) and supporting guidance? No The Number of houses anticipated seems to be twice as high as National Policy requires.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9241
Person ID	1264686

Full Name	Suzanne Doubleday
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9268
Person ID	1267329
Full Name	MARTIN DAVIES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>NPPF S11 —</p> <p>— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.</p> <p>— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.</p> <p>NPPF - S60</p> <p>— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.</p>

- The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.
- This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.
- The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.
- It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.
- The council should insist that the government uses the most accurate, and therefore up-to-date information to calculate the housing target — not just to change the statistics used to suit their aims.
- Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt — There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites
- The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt
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 - 4 c) to assist in safeguarding the countryside from encroachment;
 - 5 d) to preserve the setting and special character of historic towns; and
 - 6 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

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NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities — There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS9277

Person ID 1267330

Full Name Kat Worth

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
*** Yes**

* No

**QUESTIONS NPPF
comment**

NPPF S11 —

- There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.
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NPPF - S60

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Included files

Title Question: National Policy and Guidance

ID EGS9295

Person ID 1267333

Full Name JO MURPHY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment

Included files

Title Question: National Policy and Guidance

ID EGS9324

Person ID 1267332

Full Name Nandi Jordan

Organisation Details Chair
Berkhamsted and Tring Labour Party

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<ul style="list-style-type: none"> • Para 11(b) of the NPPF requires ‘objectively assessed needs for housing’. The number of houses should specifically meet Dacorum’s need for the full range of affordable social housing, as defined in our answer to question 1. • The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB. • Para 20(c) of the NPPF requires ‘sufficient provision for community facilities (such as health)’ there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap. • NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered. The proposed wildlife corridors are not explicit or mapped as required by the NPPF.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9355
Person ID	1267365
Full Name	Mr Jont Cole
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy "optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS9370
Person ID	1267367
Full Name	Sarah Johnson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	No

* No

**QUESTIONS NPPF
comment**

NPPF S11 —

— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.

— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

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— There is insufficient justification for building on the Green Belt

— There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites

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— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

— Not enough thought has been given to options for housing that is not on the Green Belt

- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
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According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 a) to check the unrestricted sprawl of large built-up areas;
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- 5 d) to preserve the setting and special character of historic towns; and
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NPPF Section 134

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

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- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.
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Included files

Title Question: National Policy and Guidance

ID EGS9384

Person ID 1267368

Full Name Peter Leighton-Murray

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

NPPF S11 —

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Included files

Title Question: National Policy and Guidance

ID EGS9398

Person ID 1267370

Full Name Patricia Beloe

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment NPPF S11 —

— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.

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Included files

Title

Question: National Policy and Guidance

ID	EGS9419
Person ID	1267392
Full Name	TANYA VERBEEK
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	(27) National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9448
Person ID	1267398
Full Name	Alexandra and James Donaldson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	NPPF S11 — — There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting. — There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

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— Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt — There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites — The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

— Not enough thought has been given to options for housing that is not on the Green Belt

— The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided) — it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments — the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 a) to check the unrestricted sprawl of large built-up areas;
- 3 b) to prevent neighbouring towns merging into one another;
- 4 c) to assist in safeguarding the countryside from encroachment;
- 5 d) to preserve the setting and special character of historic towns; and
- 6 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

— Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities — There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title

Question: National Policy and Guidance

ID

EGS9456

Person ID

1267401

Full Name

JACKIE BELLAMY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

<p>Yes / No * Yes * No</p>	<p>No</p>
<p>QUESTIONS NPPF comment</p>	<p>NPPF S11 —</p> <ul style="list-style-type: none"> • There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting. • There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need. <p>NPPF - S60</p> <ul style="list-style-type: none"> • It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics. • The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans. • This government policy could be characterised as saying, <i>'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.'</i> It is irrational to risk the Green Belt on such an ill-conceived policy. • The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones. • It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed. • The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target — not just to change the statistics used to suit their aims. • Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt • There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites • The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage. • The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents. <p>NPPF Section 137</p> <ul style="list-style-type: none"> • Not enough thought has been given to options for housing that is not on the Green Belt • The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)

- it is reasonable to project a higher amount of windfall given that rules on town centre and office developments
- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 a) to check the unrestricted sprawl of large built-up areas;
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- 4 c) to assist in safeguarding the countryside from encroachment;
- 5 d) to preserve the setting and special character of historic towns; and
- 6 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.
- Social housing need in Dacorum
- Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.
- Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

- **We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities**
- There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.
- The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.
- Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.
- The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title	Question: National Policy and Guidance
ID	EGS9488
Person ID	1267417
Full Name	Wendy and Paul Goodridge
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

**QUESTIONS NPPF
comment**

NPPF S11 —

— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.

— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.

— The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.

— This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.

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— Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt

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NPPF Section 137

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— The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)

— it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments

— the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt

According to the NPPF:

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a) to check the unrestricted sprawl of large built-up areas;

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

NPPF Section 134

— Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

— There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files	
Title	Question: National Policy and Guidance
ID	EGS9491
Person ID	1157289
Full Name	Rodney O'Callaghan
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p> <p>It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS9510
Person ID	399324
Full Name	Ms Julie Hollway

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	No. As above, significant and critical inconsistencies of proposed policies / delivery strategies exist vs the NPPF. Specifically, DBC have misunderstood and para 11 of the NPPF, and have failed to give appropriate weight to the qualifications of the obligation to meet objectively assessed needs, relating to Green Belt land and Areas of Outstanding Natural Beauty.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9535
Person ID	1267427
Full Name	Megan Humphreys
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9627
Person ID	1151590

Full Name	Lynda Clarke
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	27) National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9641
Person ID	1151590
Full Name	Lynda Clarke
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	(27) National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9652
Person ID	400471

Full Name	Mrs Ruth Constable
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The NPPF states that Green Belt land may only be released in exceptional circumstances. These circumstances have not been met regarding Tring for the following three reasons: the lack of evidence that other options have been assessed (e.g.brownfield sites): a lack of analysis of the number of houses that might or might not be accommodated per hectare and the lack of cooperation with neighbouring counties. Thus the need for 5945 homes within the Green Belt has not been shown.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9685
Person ID	1267468
Full Name	Chris Berry
Organisation Details	CPRE Hertfordshire
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	The NPPF as currently worded is not complied with in respect of protection of designated areas of landscape and wildlife importance and the Green Belt, or in respect of the identification of the need for development for housing and employment in particular, as addressed in response to the earlier questions in this questionnaire. Further, the Emerging Strategy does not take sufficient account of matters relating to climate change adaptation, the promotion of biodiversity and provision of infrastructure as required by legislation,

Included files	
Title	Question: National Policy and Guidance
ID	EGS9725
Person ID	1267480
Full Name	Paul Townsend
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS9796
Person ID	1267544
Full Name	CATHERINE HAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	NPPF S11 — — There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.

— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.

— The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.

— This government policy could be characterised as saying, *'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.'* It is irrational to risk the Green Belt on such an ill-conceived policy.

— The housing need projections based on the most recent data **are about half of the 2014 data** (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.

— It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.

— The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target — not just to change the statistics used to suit their aims.

— Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt

— There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites

— The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

— Not enough thought has been given to options for housing that is not on the Green Belt

— The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)

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— the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt

According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 a) to check the unrestricted sprawl of large built-up areas;
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- 5 d) to preserve the setting and special character of historic towns; and
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NPPF Section 134

— Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

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— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

— There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files	
Title	Question: National Policy and Guidance
ID	EGS9810
Person ID	1263842
Full Name	Karen Roberts
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>Green belt grab insupportable and unjustifiable</p> <p>If implemented, these damaging proposals would result in the loss of a massive 850 hectares of the Green Belt, the wider countryside and urban green space for development.</p> <p>There is ample basis for arguing that land constraints such as Green Belt preservation may be used as a justification for lowering housing numbers as derived from central government calculations. The Council should challenge both the August and December 2020 housing targets which are clearly not in line with the intent of Government policy before proceeding further with the Local Plan.</p> <p>Furthermore, it is not clear that the It is not clear that the NPPF requirement for the Plan to fully explore the potential to make effective use of urban land (s. 118 and s.137) before releasing Green Belt land has been met.</p> <p>Surely the role of the high street and local retail/ employment needs to be considered very more carefully in the light of new work practices. I would ask that the local plan be revised.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS9831
Person ID	
Full Name	
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p>

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS9859

Person ID 1267744

Full Name GARETH BELLAMY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment

NPPF S11 —

- There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.
- There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

- It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.
- The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.

- This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.
- The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.
- It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.
- The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target — not just to change the statistics used to suit their aims.
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NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt
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- 2 a) to check the unrestricted sprawl of large built-up areas;
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- 5 d) to preserve the setting and special character of historic towns; and
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NPPF Section 134

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NPPF Section 61

- We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities
- There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.
- The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.
- Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.
- The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS9937

Person ID 1267774

Full Name AATMA SEESURRUN

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
QUESTIONS NPPF comment	National Policy and guidance - the plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS10025
Person ID	1267862
Full Name	ALEX CHAPLIN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTIONS NPPF comment	<p>NPPF S11 —</p> <p>— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.</p> <p>— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.</p> <p>NPPF - S60</p> <p>— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.</p> <p>— The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.</p> <p>— This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.</p>

- The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed to the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.
- It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.
- The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target — not just to change the statistics used to suit their aims.
- Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt
- There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites
- The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt
- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
- it is reasonable to project a higher amount of windfall given the rules on town centre and office developments
- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

134. Green Belt serves five purposes:

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

NPPF Section 134

— Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

— There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

Included files

Title Question: National Policy and Guidance

ID EGS10057

Person ID 1155402

Full Name Christopher Stafford

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment (27)
National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.

Included files	
Title	Question: National Policy and Guidance
ID	EGS10091
Person ID	1268034
Full Name	MR IAN GUNTER-JONES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of set</p>

lements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS10109

Person ID 1268045

Full Name C PERRY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS10126

Person ID 1146091

Full Name Mr John Foster

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes
* No

**QUESTIONS NPPF
comment**

NPPF S11 — There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.
— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60 — It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.
The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.
It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.

The council should insist that the government uses the most accurate, and therefore up-to- date information to calculate the housing target — not just to change the statistics used to suit their aims.
Using out-of-date statistics means that the projections are not an 'objectively assessed need'.
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The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.
The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137
Not enough thought has been given to options for housing that is not on the Green Belt
The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
The pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt
According to the NPPF:
134. Green Belt serves five purposes:
a) to check the unrestricted sprawl of large built-up areas;
b) to prevent neighbouring towns merging into one another;
c) to assist in safeguarding the countryside from encroachment;
d) to preserve the setting and special character of historic towns; and
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic. Social housing need in Dacorum Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

Included files

Title Question: National Policy and Guidance

ID EGS10231

Person ID 1268167

Full Name CHRIS YOUDELL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTIONS NPPF comment National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.

Included files

Title Question: National Policy and Guidance

ID EGS10283

Person ID 399324

Full Name Ms Julie Hollway

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Consistency with the National Planning Policy Framework (NPPF) and supporting guidance NO. As above, significant and critical inconsistencies of proposed policies / delivery strategies exist vs the NPPF. Specifically, DBC have misunderstood and para 11 of the NPPF, and have failed to give appropriate weight to the qualifications of the obligation to meet objectively assessed needs, relating to Green Belt land and Areas of Outstanding Natural Beauty.
Included files	
Title	Question: National Policy and Guidance
ID	EGS10315
Person ID	1268339
Full Name	Mr Adam Craig
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	Do you think the plan is consistent with National Planning Policy Framework (NPPF) and supporting guidance? There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting. There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.

The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.

This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.

The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed to the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.

It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.

The council should insist that the government uses the most accurate, and therefore up-to-date information to calculate the housing target — not just to change the statistics used to suit their aims.

- Using out-of-date statistics means that the projections are not an 'objectively assessed need'.
- There is insufficient justification for building on the Green Belt
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- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt

- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
- it is reasonable to project a higher amount of windfall given the rules on town centre and office developments
- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 a) to check the unrestricted sprawl of large built-up areas;
- 3 b) to prevent neighbouring towns merging into one another;
- 4 c) to assist in safeguarding the countryside from encroachment;
- 5 d) to preserve the setting and special character of historic towns; and
- 6 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

- We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities
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— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS10324

Person ID 1268350

Full Name Mrs Tamsyn Craig

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment

Do you think the plan is consistent with National Planning Policy Framework (NPPF) and supporting guidance?

There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.

There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.

The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.

This government policy could be characterised as saying, 'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.' It is irrational to risk the Green Belt on such an ill-conceived policy.

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The council should insist that the government uses the most accurate, and therefore up-to-date information to calculate the housing target — not just to change the statistics used to suit their aims.

- Using out-of-date statistics means that the projections are not an 'objectively assessed need'.
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- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

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- it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments

— the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 a) to check the unrestricted sprawl of large built-up areas;
- 3 b) to prevent neighbouring towns merging into one another;
- 4 c) to assist in safeguarding the countryside from encroachment;
- 5 d) to preserve the setting and special character of historic towns; and
- 6 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

— Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

— There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS10347

Person ID 1268418

Full Name JOSEPHINE O'NEILL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

The plan has failed to consider fully:

Section 2, Achieving sustainable development, Point 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.

Section 3, Strategic policies, Point 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been little assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.

Section 15, Conserving and enhancing the natural environment, Point 175

NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.

Included files

Title Question: National Policy and Guidance

ID EGS10364

Person ID	1268427
Full Name	GRAHAM HAYNES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The document is full of assertions but contains no evidence that the issue of Net Environmental Gain will be addressed.
Included files	
Title	Question: National Policy and Guidance
ID	EGS10407
Person ID	1268432
Full Name	SARAH STUBBS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS10442
Person ID	1268446

Full Name	JOHN KING
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS10479
Person ID	1268450
Full Name	JOSEPH STOPPS
Organisation Details	DACORUM GREEN PARTY
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>Dacorum Green Party supports the need for a local plan and accepts the need to build a reasonable number of new sustainable and affordable properties in the Borough. The latest ONS data available projects 6051 new homes in Dacorum by 2038 – 64% FEWER than this plan projects.</p> <p>The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Para 20(c) of the NPPF requires ‘sufficient provision for community facilities (such as health)’</p>

. We do not believe The Local Plan has provided such sufficient provision.

We agree with the assessment of other local groups that the NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered which is why we call for every acre of green belt land that is developed an additional 2 acres of green belt land should be rewilded.

The NPPF requires wildlife corridors to be explicitly mapped. They are not in the local plan.

The National Planning Policy Framework (19 February 2019) (NPPF) states: "The Government attaches great importance to Green Belts. 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 their permanence (Paragraph 133 NPPF)." Releasing Green Belt land on the scale envisaged in this draft plan ought to be difficult to justify since paragraph 136 of the NPPF is totally clear that: "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans." The "exceptional circumstances" that could justify release of Green Belt land on such a scale are simply not evidenced in these documents.

Included files

Title Question: National Policy and Guidance

ID EGS10503

Person ID 869129

Full Name Ms Ann Hetherington

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTIONS NPPF comment The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS10554
Person ID	1268687

Full Name	Ms Isabelle Robinson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS10563
Person ID	1268702
Full Name	Kirstin Chaplin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>NPPF S11 —</p> <p>— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.</p> <p>— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.</p> <p>NPPF - S60</p> <p>— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.</p>

- The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.
- This government policy could be characterised as saying, *'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.'* It is irrational to risk the Green Belt on such an ill-conceived policy.
- The housing need projections based on the most recent data **are about half of the 2014 data** (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.
- It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.
- The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target — not just to change the statistics used to suit their aims.
- Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt
- There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites
- The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt
- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
- it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments
- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt

According to the NPPF:

134. Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;

- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

— Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

— There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files	
Title	Question: National Policy and Guidance
ID	EGS10576
Person ID	1164729

Full Name	David Clarke
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS10594

Person ID 1268725

Full Name CHARLOTTE SMITH

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

Included files

Title Question: National Policy and Guidance

ID EGS10607

Person ID 1268726

Full Name DR ADRIENNE GARNER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS10635
Person ID	1268732
Full Name	KATRINA BECKWITH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	For reasons identified within this report, the council have failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The council have failed to accord with Paragraph 24 of the Framework, as they have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.
Included files	
Title	Question: National Policy and Guidance
ID	EGS10643
Person ID	369415
Full Name	Mr Dacorum EnvironmentalForum
Organisation Details	Chair

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p><i>“17.3 et seq Local planning authorities are bound by the legal duty set out in the 2008 Planning Act to ensure that, taken as whole, plan policy contributes to the mitigation of and adaptation to climate change. The NPPF expands on this duty, stating that: “local planning authorities should adopt proactive strategies to mitigate and adapt to climate change (paragraph 149) (in line with the objectives and provisions of the Climate Change Act 2008).”</i></p> <p><i>Not only should the final version of the NLP reflect all the requirements of the NPPF, (which DEF asserts is not the case) but be compliant with currently available updates to government legislation, and changes to algorithms for Local Housing Demand. We note that it was reported on 16/12/2020 that Robert Jenrick had withdrawn the algorithm on which the calculation in the NLP has been based.</i></p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS10668
Person ID	1268741
Full Name	BRIAN WHITEHEAD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	

Title	Question: National Policy and Guidance
ID	EGS10710
Person ID	1268746
Full Name	DANIEL GARROD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	This plan does not appear consistent with NPPF since it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	

Title	Question: National Policy and Guidance
ID	EGS10713
Person ID	1161079
Full Name	Melanie Llewellyn
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	It concentrates development in the South East where there is already too much housing, traffic and concentration of population with the resulting problems of water resources, and infrastructure deficiencies as I have previously stated. The pressing national requirement is for levelling up. DCB's plans do just the opposite. There should be greater housing density in other parts of the country to encourage the movement of populations to more peripheral areas resulting in their regeneration.

Included files	
Title	Question: National Policy and Guidance
ID	EGS10728
Person ID	1145421
Full Name	Mrs Shirley White
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS10749
Person ID	1145586
Full Name	Miss Hannah Moynehan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<ul style="list-style-type: none"> Para 11(b) of the NPPF requires 'objectively assessed needs for housing'. The number of houses should specifically meet Dacorum's need for the full range of affordable social housing, as defined in my answer to question 1

- The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB
- Para 20(c) of the NPPF requires ‘sufficient provision for community facilities (such as health)’ there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.
- NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered

The proposed wildlife corridors are not explicit or mapped as required by the NPPF.

Included files

Title Question: National Policy and Guidance

ID EGS10757

Person ID 1268754

Full Name Mrs Rebecca Lumsdon

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The sites do not meet sustainability assessment requirements as set by Dacorum BC. The sites conflict with Dacorum’s own plan policies.

Bk07 – Lock Field – shown be delisted. It is unsuitable for development.

The infrastructure demands to absorb this population growth have been ignored.

Site design proposals (SPD’s) have not been drafted, so no details what proposed in depth for each site’

Have not considered that “Shootersway” be considered as one overall neighbourhood “community” development – not 7 separate, non-contiguous sites, where separate developer objectives would deliver sub optimal social outcomes.

That the plan to date has insufficiently covered the social isolation impacts of these sites, in particular sites Bk06 and Bk08, and how these sites can best be fully absorbed into the community.

No real attempt, or acceptance of commitments, to finding supporting transport solutions for these new, dispersed sites has been forthcoming, e.g. bus services.

As presented the Draft Local Plan does not address for the existing population how their existing social assets and facilities will be maintained and not overwhelmed.

How, as far as is practical, will existing quality of life standards be protected, maintained, and where shortfalls currently exist that they would be addressed.

will not seek to increase road capacity". (Local Plan paras 21.17 and 23.120 refer)

Attrition against car uses, by resisting road improvement and adding to congestion, makes life difficult for everyone. More congestion, traffic delays, parking problems will impact by default on all - pedestrians, cyclists, bus users, commercial road users et al.

The Draft Local Plan is likely to create a "Catch 22". Wasting resources by tinkering at edge and not addressing crux of the problems,

More car usage is unavoidable, if population / housing is to be expanded. Not expanding and emodelling road infrastructure are not an acceptable alternative.

Dacorum's approach is not in accord with Hertfordshire's Transport Plan (LTP4).

Dacorum's Local Plan is not in keeping with its own attitudes in its Draft Site Sustainability Appraisals and its Draft Infrastructure Delivery Plan. The latter saying for the Shootersway sites.

" Development of this site would likely result in an increase in traffic to and from the site at peak hours, which would have a limited impact upon the local road network. If larger scale growth is proposed in the south west of Berkhamsted, it is likely that this would give rise to further traffic issues along Shootersway, particularly at the junction with the A416/Kings Road and the A41 junction. "

For Darr's Lane, wording is amplified:

"...Development is likely to have an impact on the local road network at peak periods, including along Shootersway and Kings Road/A416. Significant improvements would likely be required, including enhancements to Darr's Lane, Durrants Lane, Berkhamsted High Street, Shootersway, Kings Road and the A416. "

Similar remarks are included in the Draft Infrastructure Delivery Plan (App B) that some of the sites are relatively close to bus transport :

Haslems Field = "Site is a 15-20 minute walk from the frequent 500/501 service

to Watford. The 502 and 532 bus service to Hemel Hempstead is a 10 minute walk and is infrequent in comparison to the 500/501 service. "

arr's Lane = "Site is within walking distance to the frequent 500 bus services to both Watford and Aylesbury. Site is also within walking distance to the less frequent bus service of 532 to Hemel Hempstead.

A site of this scale has the potential to provide new/enhanced public transport connections with the existing town and wider area. "

Sites might be 15-20 minutes walk to access the A4251 and main bus services. BUT Up-hill on way home tired, then time = ??

What about on cold winter days, dark morning and dark evenings??

Equally not easy for young mum with young family in tow during the daytime – particularly on bad weather days. What about infirm etc.

Now add to above, for Darr’s Lane, that for half of the 1.2Km walk to the A4251, the route is single-track, no street-lights, and no pathways.

Included files

Title Question: National Policy and Guidance

ID EGS10763

Person ID 1268755

Full Name Mrs Lesley Reynolds

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment -

Included files

Title Question: National Policy and Guidance

ID EGS10773

Person ID 1268759

Full Name Mrs Catherine Rudin

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in- line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p> <p>I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS10778
Person ID	1268761
Full Name	Mr David Colvin
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The proposals are infringing on the designated AONB within and surrounding Tring. These proposals are a blatant abuse of the principles of the AONB which are to protect the countryside.
Included files	
Title	Question: National Policy and Guidance
ID	EGS10786
Person ID	1268762
Full Name	Mrs Natalie Hill
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield</p>

sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS10796
Person ID	1268763
Full Name	Mr Michael Hill
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

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Included files	
Title	Question: National Policy and Guidance
ID	EGS10849
Person ID	1145633
Full Name	Mrs Suzanne Nixon
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTIONS NPPF comment	I don't know, but if it is, I would question the wisdom of the National Planning Policy Framework. I am aware that central government has been promoting changes that would give local authorities less control over local planning issues which cannot be a good thing.
Included files	
Title	Question: National Policy and Guidance
ID	EGS10895
Person ID	1268687
Full Name	Ms Isabelle Robinson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS10905
Person ID	1268814
Full Name	Ms Emma Cotton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTIONS NPPF comment	<p>The plan has failed to consider fully:</p> <p>Section 2, Achieving sustainable development, Point 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Section 3, Strategic policies, Point 20(c) of the NPPF requires ‘sufficient provision for community facilities (such as health)’ there appears to have been little assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>Section 15, Conserving and enhancing the natural environment, Point 175 NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS10948
Person ID	1268880
Full Name	Ms Jo-anne Tunmer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>NPPF S11 —</p> <p>— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.</p> <p>— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.</p> <p>NPPF - S60</p>

- It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.
- The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.
- This government policy could be characterised as saying, *'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.'* It is irrational to risk the Green Belt on such an ill-conceived policy.
- The housing need projections based on the most recent data **are about half of the 2014 data** (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.
- It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.
- The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target — not just to change the statistics used to suit their aims.
- Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt
- There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites
- The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt
- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
- it is reasonable to project a higher amount of windfall given thar rules on town centre and office developments
- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt

According to the NPPF:

134. Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;

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

NPPF Section 134

— Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

— There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title

Question: National Policy and Guidance

ID	EGS10963
Person ID	1268886
Full Name	Mr Paul Jayson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS10979
Person ID	1268903
Full Name	ANGELA NODDER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	There is not enough consideration or provision of infrastructure needs
Included files	
Title	Question: National Policy and Guidance
ID	EGS10991

Person ID	1162376
Full Name	Jade Holmes
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS11004

Person ID 1263256

Full Name Anthony Blumsom

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment The NPPF allows for building on green belt in exceptional circumstances and sets out a number of considerations for this which have simply been ignored in this proposal.

Included files

Title Question: National Policy and Guidance

ID EGS11014

Person ID 333882

Full Name Mr Mark Barfield

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p> <p>It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.</p>
Included files	

Title	Question: National Policy and Guidance
ID	EGS11036
Person ID	1268909
Full Name	Dr Leslie Kennedy
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Having been involved with the preparation of a Neighbourhood Plan I do not consider that this plan is compliant with the NPPF and the objectives of the Localism Act.
Included files	

Title	Question: National Policy and Guidance
ID	EGS11048
Person ID	1145445
Full Name	Mr Jason McInerney
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

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Included files

Title Question: National Policy and Guidance

ID EGS11059

Person ID 1268912

Full Name SIAN FITZPATRICK

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS11066
Person ID	1268913
Full Name	SONIA FAIRBARN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	NPPF requires Net Environmental Gain. There is no evidence within the draft plan that this will be addressed. With the elements of the Plan not complying with legislation (e.g. protection of the SAC, which is already subject to adverse impacts from nitrogen levels, air pollution, human pressure leading to tree root compaction, loss of biodiversity, introduction of invasive species, etc), policy guidance and appraisals it follows that there can be no accurate assessment of adverse impacts and therefore no accurate assessment of what is required in the way of Net Environmental Gain. Guesswork in terms of what NEG will be required and whether it can be achieved provides a draft plan that is not fit for purpose.
Included files	
Title	Question: National Policy and Guidance
ID	EGS11077

Person ID	1144903
Full Name	Mr Brian Rook
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<ul style="list-style-type: none"> 'The NPPF demands that there should be "exceptional circumstances" before Green Belt boundaries can be changed and says that inappropriate development is harmful to the Green Belt and should be approved only in "very special circumstances." This briefing is from the House of Commons Library. 11.20 <p>In your plan, you have failed to show that there is any evidence whatsoever of any "Very Special circumstances"</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS11097
Person ID	1258923
Full Name	Arthur Barfield
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

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With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS11115
Person ID	1268939
Full Name	Ms Sylvia O'Brien
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	No

* No

**QUESTIONS NPPF
comment**

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

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With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

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Included files

Title	Question: National Policy and Guidance
ID	EGS11187
Person ID	1264551
Full Name	Mark Somervail
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The plan is not consistent with the requirement in the NPPF to build on Green Belt only in exceptional circumstances. Since the plan is based on housing figures which are almost double the 2018 projections, it has not correctly established a need to destroy Green Belt and consider the Chiltern's AONB which is adjacent to Bk06.</p> <p>The Dacorum plan does not provide a valid justification or exceptional circumstances for destroying Green Belt. Rather than minimise use of Green Belt as required, it has maximised it.</p> <p>There is no mention of the existing pollution problems in Northchurch.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS11202
Person ID	1268982
Full Name	Mr Andrew Yeomans
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

**QUESTIONS NPPF
comment**

I support the submissions of the Chiltern Countryside Group (CCG) and the Grove Fields Residents Association (GFRA) on this question.

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard to exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

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Included files

Title Question: National Policy and Guidance

ID EGS11230

Person ID

Full Name

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy "optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p>

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS11253

Person ID 1262469

Full Name Mark Waters

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

No

QUESTIONS NPPF comment As a member of the public not versed in Planning Law and the National Policy Framework I find it impossible to comment. If the conclusions reached for Tring are consistent with these documents something is seriously wrong.

Included files

Title Question: National Policy and Guidance

ID EGS11254

Person ID 1268990

Full Name Mr Nick de la Bedoyere

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

No

**QUESTIONS NPPF
comment**

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine all other reasonable options for meeting its identified need for development before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

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With regard Part b) there is an expectation that the strategy optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

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Included files

Title Question: National Policy and Guidance

ID EGS11270

Person ID 1268893

Full Name Mr Martin Hopping

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

<p>Yes / No * Yes * No</p>	<p>No</p>
<p>QUESTIONS NPPF comment</p>	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “ all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “ optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport” . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p> <p>It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’ s expectation of delivery of 5,945 homes within the Green Belt has not been justified.</p>
<p>Included files</p>	

Title	Question: National Policy and Guidance
ID	EGS11278
Person ID	221884
Full Name	Ms Eliza Hermann
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>No, the proposed Plan is not consistent with the NPPF, supporting guidance and legal precedent. In particular, the NPPF and legal precedent support greater protection of the Green Belt and caring for the environment than envisaged in the proposed Plan.</p> <p>Para. 133 of the NPPF states clearly that “The government attaches great importance to Green Belts. 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.”</p> <p>Para. 134 of the NPPF goes on to say “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 <p>Para. 136 of the NPPF says “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.” This clause requires evidence, not meeting quotas, in order to alter Green Belt boundaries.</p> <p>Para. 11 of the NPPF makes clear that housing need alone does not constitute “exceptional circumstances”. It says Local Plans should meet housing need unless policies in the NPPF that protect areas or assets of particular importance</p>

provides a strong reason for restricting the overall scale of development, listing Green Belts, AONBs and SACs amongst such “areas or assets”.

Para. 170 of the NPPF says planning policies should enhance the natural environment by “protecting and enhancing valued landscapes” and “recognising the intrinsic character and beauty of the countryside” including recognising the benefits of agricultural land, trees and woodland.

Paras. 174 and 175 of the NPPF state that plans should promote the conservation, restoration and enhancement of priority habitats, and where harm to biodiversity cannot be avoided than planning permission should be refused. Priority habitats are defined in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006 and include chalk rivers.

Para. 15 says that Plans should be succinct. The main sections of this proposed Dacorum Plan total several hundred pages. With the various supporting studies and topic papers, the consultation documentation runs to thousands of pages. This volume of material impedes transparency and makes public scrutiny very difficult.

Dacorum's proposed Plan also uses out-dated data and a flawed algorithm to calculate housing need. Using the most recent 2018 ONS-based housing projections would result in housing need of around 50% or less than that calculated by the Council. This in turn would make unnecessary the release of any Green Belt land for development.

There is also legal precedent for adopted Local Plans not meeting calculated housing need in full due to a variety of constraints, although the Council appears not to recognise this. Examples include -

- Adur, Plan adopted 2017 with 177 dwellings per annum (dw pa) versus Standard method derived target of 453 dw pa
- Birmingham, Plan adopted 2017 with 2555 dw pa versus Standard method derived target of 3577 dw pa
- Bedford, Plan adopted 2020 with 970 dw pa versus Standard method derived target of 1345 dw pa
- New Forest, Plan adopted 2020 with 521 dw pa versus Standard method derived target of 997 dw pa
- Thanet, Plan adopted 2020 with 857 dw pa versus Standard method derived target of 1117 dw pa

Included files	
Title	Question: National Policy and Guidance
ID	EGS11295
Person ID	1268994

Full Name	Mrs Julie Hopping
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “ all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “ optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport” . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS11301

Person ID 1268998

Full Name Mr Philip Hodgson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment Not any more.

Included files

Title Question: National Policy and Guidance

ID EGS11325

Person ID 1269000

Full Name Mrs Tracey Franklin

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The plan has failed to consider fully:</p> <p>Section 2, Achieving sustainable development, Point 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Section 3, Strategic policies, Point 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been little assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>Section 15, Conserving and enhancing the natural environment, Point 175 NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS11348
Person ID	1269008
Full Name	Mr Steven Kerry
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	As defined at Paragraph 136 of the NPPF ' <i>Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.</i> ' Furthermore, Paragraph 137 states ' <i>before concluding that exceptional circumstances</i>

exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.' We respectfully consider the Council has not explored all available options in meeting its housing requirement, overlooking sustainable growth options of the settlements located outside of the Green Belt and AONB areas.

Included files	
Title	Question: National Policy and Guidance
ID	EGS11358
Person ID	221830
Full Name	Mrs Baerbel de la Bedoyere
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted</p>

in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b). Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance. It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS11366
Person ID	398597
Full Name	Mrs Caroline Freer
Organisation Details	Flamstead Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The proposals within the Local Plan directly contradict the National Planning Policy
Included files	
Title	Question: National Policy and Guidance
ID	EGS11394
Person ID	1207629
Full Name	Strategic Planning Department
Organisation Details	Strategic Planning Department Three Rivers District Council
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	As noted above in the context of The Housing Strategy (Question 2), the figure of 16,596 net additional homes is based upon the revised standard method which the Government is no longer intending to take forward. The housing target for DBC will therefore be higher than stated in this consultation version of the Plan and subsequently, further sites may need to be included in order for DBC to meet its local housing need figure and in order for future versions of the Plan to be consistent with the NPPF and guidance.
Included files	
Title	Question: National Policy and Guidance
ID	EGS11398
Person ID	1269021
Full Name	RUPERT SELDON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	Although the plan's overarching aim is consistent with the NPPF, it fails to make sufficient provision for the conservation and enhancement of natural and historic environment. Piccotts End and Winkwell are historic hamlets at risk of being overwhelmed by the proposed development of surrounding fields. The extensive use of greenbelt land in the plan is inconsistent with conservation of the natural environmental priorities. Although the plan includes provision of infrastructure in the new developments only, the surrounding existing infrastructure will be overwhelmed.
Included files	
Title	Question: National Policy and Guidance
ID	EGS11404

Person ID	1262227
Full Name	James White
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	Given that the government is currently revising planning policy, and the impact that these revisions have on the NPPF, it seems relevant to this process that the plan be revised to take these changes and the emerging governmental policy objectives into account before proceeding any further.
Included files	
Title	Question: National Policy and Guidance
ID	EGS11410
Person ID	1269022
Full Name	JENNI WHITE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Given that the government is currently revising planning policy, and the impact that these revisions have on the NPPF, it seems relevant to this process that the plan be revised to take these changes and the emerging governmental policy objectives into account before proceeding any further.
Included files	
Title	Question: National Policy and Guidance

ID	EGS11416
Person ID	1269023
Full Name	DOUG DUNN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS11455
Person ID	1264362
Full Name	Juliet Miller
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<ul style="list-style-type: none"> • Para 11(b) of the NPPF requires ‘objectively assessed needs for housing’. The number of houses should specifically meet Dacorum’s need for the full range of affordable social housing, as defined in my answer to question • The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and

- Para 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been no assessment of the impact on capacity of

existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.

- NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately

The proposed wildlife corridors are not explicit or mapped as required by the NPPF

Included files

Title Question: National Policy and Guidance

ID EGS11464

Person ID 1261429

Full Name Douglas Fisher

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

- See comments under Question 4 regarding NPPF Paragraph 145

- Paragraph 19.8 refers to NPPF Para 146 as the reason for there being "no necessity to have a detailed coverage of non-strategic policies in the Plan to manage all forms of development in the Green Belt"

This is not the case as there is no policy in this new Local Plan covering equestrian facilities currently being dealt with under saved Policy 81. That policy covers a range of equestrian uses from small scale private stables to commercial liverys that could either come under NPPF Para 146 a) agricultural, if merely horse grazing or 146 b) if being used for riding etc. As there is a significant amount of equestrian activity in the rural parts of the Borough, often on Green Belt

and/or land within the AONB, a local policy is needed to replace saved Policy 81 which seems to have served its purpose very well in controlling such development.

Included files

Title Question: National Policy and Guidance

ID EGS11471

Person ID 1262872

Full Name Fiona Trinder

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTIONS NPPF comment

Included files

Title Question: National Policy and Guidance

ID EGS11490

Person ID

Full Name

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTIONS NPPF comment	NPPF - The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB. Para 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap. NPPF requires development on Greenbelt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered. The proposed wildlife corridors are not explicit or mapped as required by the NPPF.
Included files	
Title	Question: National Policy and Guidance
ID	EGS11505
Person ID	865014
Full Name	Mr Robert Turnbull
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine all other reasonable options for meeting its identified need for development before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p>

With regard Part b) there is an expectation that the strategy optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plans expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS11509
Person ID	1269116
Full Name	Mr & Mrs S & J Ballantyne
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	
* Yes	
* No	

QUESTIONS NPPF comment	I'm not able to assess that technical point.
Included files	
Title	Question: National Policy and Guidance
ID	EGS11519
Person ID	1269117
Full Name	ANITA PARRY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a</p>

significant uplift in minimum density standards in town and city centres and other locations well served by public transport". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS11536
Person ID	1144732
Full Name	MR john reynolds
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance

ID	EGS11542
Person ID	1269120
Full Name	JANE VELLACOTT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS11556
Person ID	1269122
Full Name	KATHRYN WHITTLE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for</p>

development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Heme! Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport" . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan' s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS11567

Person ID 1269123

Full Name	KENTON WHITTLE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport" . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS11590

Person ID 1269146

Full Name MAXWELL CLIFTON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment

Included files

Title Question: National Policy and Guidance

ID EGS11637

Person ID 1158198

Full Name JACK ARMSTRONG

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	(no comment)
Included files	
Title	Question: National Policy and Guidance
ID	EGS11655
Person ID	1269150
Full Name	Mrs Helena Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The plan has failed to consider fully:</p> <p>Section 2, Achieving sustainable development, Point 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to impacts on the Greenbelt and AONB.</p> <p>Section 15, Conserving and enhancing the natural environment, point 175 NPPF requires development in Greenbelt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces. Although small green spaces are included in the plan, the amount of green space is inadequate for the population increase expected.</p>
Included files	

Title	Question: National Policy and Guidance
ID	EGS11667
Person ID	1269152
Full Name	SIMON RHEAD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and</p>

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS11694

Person ID 1269212

Full Name PETER SCOTT

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment

- Para 11(b) of the NPPF requires 'objectively assessed needs for housing'. The number of houses should specifically meet Dacorum's need for the full range of affordable social housing, as defined in our answer to question
- The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and
- Para 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the
- NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately

The proposed wildlife corridors are not explicit or mapped as required by the NPPF

Included files

Title Question: National Policy and Guidance

ID EGS11716

Person ID 1269217

Full Name Mr David Hulse

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as

part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS11732

Person ID 1152494

Full Name MRS G RUSSELL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

QUESTIONS NPPF comment

The DBC plan is not consistent with the NPPF in many areas, using “exceptional” need of public interest as an excuse not to conform, when in fact these are not “exceptional”, and do not allow the Council to over-ride the constraints. This applies especially to the Green Belt, the Chilterns Area of Outstanding Natural Beauty, the Chilterns Beechwoods SAC, and the AONB. NPPF para 11, footnote 6, allows local authorities to restrict the scale of development due to impacts on the Green Belt and AONB. DBC has chosen to ignore this.

NPPF also requires detailed carbon budgets and committed targets of local carbon reduction to be an integral part of local plan, not as good intentions as in the DBC plan.

Included files	
Title	Question: National Policy and Guidance
ID	EGS11758
Person ID	1269233
Full Name	CIARA KENT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy "optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance. It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS11780

Person ID 871625

Full Name Mrs Clare Francis

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy" optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS11784

Person ID 1269235

Full Name Miss Eleanor Smith

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment (no comment)

Included files

Title Question: National Policy and Guidance

ID EGS11802

Person ID 1269243

Full Name	HARRIET MESHER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	No, these plans are over-developing the area and not in context of the existing towns.
Included files	
Title	Question: National Policy and Guidance
ID	EGS11806
Person ID	1269244
Full Name	GAVIN BAYLISS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	No, these plans are over-developing the area and not in context of the existing towns.
Included files	
Title	Question: National Policy and Guidance
ID	EGS11831
Person ID	350823
Full Name	Mrs Sue Yeomans

Organisation Details	Chairman Chilterns Countryside Group
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The Local Plan fails to demonstrate any fulfilment of Government policy through the NPPF that Green Belt should only be released for development in 'exceptional circumstances'. There are none. I fully endorse the response of the Chiltern Countryside Group to this question.
Included files	
Title	Question: National Policy and Guidance
ID	EGS11836
Person ID	1262872
Full Name	Fiona Trinder
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS11864
Person ID	1269275

Full Name	KALLIOPI KOUTSOU
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>The result is 5,954 homes will be in "greenfield growth areas" which to all but the Council is known as Green Belt and most of it on the outskirts of Berkhamsted and Tring. In arriving at this position the Council have ignored national Planning Policy contained in the NPPF and statements by Ministers including the PM that Green Belt should not be developed except in 'exceptional circumstances'. The Council makes no effort to explain what the exceptional circumstances are in this Borough. The Council's proposals are neither justifiable or sustainable and this is the core of our opposition to this draft Plan. DBC should revert to the Core Strategy vision statement.</p> <p>(27)</p> <p>National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban developmen</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS11897
Person ID	1269277
Full Name	DEFINE PLANNING AND DESIGN LTD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTIONS NPPF comment	Comments in relation to the plan's consistency with the National Planning Policy Framework (NPPF) are outlined in response to specific policies within the representations made to Questions 1 to 5 (above).
Included files	
Title	Question: National Policy and Guidance
ID	EGS11912
Person ID	1269207
Full Name	Millbank Land Millbank Land
Organisation Details	Millbank Land Ltd
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>The draft Local Plan does not meet the Government's objective to significantly boost the supply of homes (NPPF paragraph 59). It is also not consistent with the NPPF due to its failure to include the correct housing requirement figure as calculated using the standard method set out in the national planning guidance (paragraph 60) and does not allocate sufficient land to meet this higher housing requirement for the full Plan period (paragraph 67).</p> <p>It is therefore key that the Local Plan includes the higher housing requirement as set out using the standard method as its minimum housing target but seeks to allocate sufficient sites to allow for suitable flexibility in the supply to meet this target. As mentioned under Question 2, this should include a variety of sites to support this, whilst also ensuring that a five-year supply of deliverable housing sites can be demonstrated upon adoption of the Plan in accordance with NPPF paragraph 74. Without these changes, the Plan cannot be considered sound for adoption.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS11962
Person ID	1269350
Full Name	Jan Dent Safer Gravel Path Action Group
Organisation Details	SECRETARY

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	27) National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS11970
Person ID	1269352
Full Name	Walid Youssef
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The result is 5,954 homes will be in "greenfield growth areas" which to all but the Council is known as Green Belt and most of it on the outskirts of Berkhamsted and Tring. In arriving at this position the Council have ignored national Planning Policy contained in the NPPF and statements by Ministers including the PM that Green Belt should not be developed except in 'exceptional circumstances'. The Council makes no effort to explain what the exceptional circumstances are in this Borough. The Council's proposals are neither justifiable or sustainable and this is the core of our opposition to this draft Plan. DBC should revert to the Core Strategy vision statement.</p> <p>National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development</p>

Included files	
Title	Question: National Policy and Guidance
ID	EGS12013
Person ID	1269353
Full Name	TESSA BARFIELD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted</p>

in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS12019

Person ID 1171333

Full Name Millbank Land

Organisation Details Millbank Land

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

QUESTIONS NPPF comment

The draft Local Plan does not meet the Government's objective to significantly boost the supply of homes (NPPF paragraph 59). It is also not consistent with the NPPF due to its failure to include the correct housing requirement figure as calculated using the standard method set out in the national planning guidance (paragraph 60) and does not allocate sufficient land to meet this higher housing requirement for the full Plan period (paragraph 67).

It is therefore key that the Local Plan includes the higher housing requirement as set out using the standard method as its minimum housing target but seeks to allocate sufficient sites to allow for suitable flexibility in the supply to meet this target. As mentioned under Question 2, this should include a variety of sites to support this, whilst also ensuring that a

five-year supply of deliverable housing sites can be demonstrated upon adoption of the Plan in accordance with NPPF paragraph 74. Without these changes, the Plan cannot be considered sound for adoption.

Included files

Title Question: National Policy and Guidance

ID EGS12045

Person ID 1269361

Full Name Dr Freya Rumball

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTIONS NPPF comment

Included files

Title Question: National Policy and Guidance

ID EGS12051

Person ID 330363

Full Name Mr. Graham Lay

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS12063
Person ID	1264202
Full Name	Philippa Wosiek
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>I believe that Dacorum should put forward a plan that is for Dacorum not just following guidance from the NPPF which is a central Government body. A local authority should act, represent and stand up for its residents with their own first hand knowledge of the area that they represent. I feel that the Local Plan was put together as a desk top exercise and that Dacorum should visit each and every site BEFORE they include it in the Local Plan. That way I am sure they would realise that many of the comments raised in the Response Forms are totally valid.</p> <p>The sheer lack of knowledge putting forward building houses in BK06, BK07 and BK08 with the very limited and already overused road connections is pure folly.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS12081
Person ID	1269372
Full Name	MATTHEW SPEED
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy "optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p>

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Included files

Title Question: National Policy and Guidance

ID EGS12094

Person ID 1269386

Full Name KERR LINDA

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment An increase in population would need to be supported by increased health care facilities which are not mentioned.

Included files

Title Question: National Policy and Guidance

ID EGS12110

Person ID 1145854

Full Name Mrs Deborah Doughty

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

No

**QUESTIONS NPPF
comment**

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

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Included files

Title

Question: National Policy and Guidance

ID	EGS12141
Person ID	1269413
Full Name	Mr Chris Wallis
Organisation Details	Hon. Director of Development Tring Sports Forum
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	We believe that the burden on Tring increase its size by over 50% is not justifiable. Moreover, nobody seems to be able to explain why there has been this move away from Hemel Hempstead taking the brunt of development, with Tring and Berkhamsted taking roughly equal proportions of the remainder, which is no longer the case. Tring's share is grossly disproportionate to the whole, its setting in the foothills of the CAONB is unique.
Included files	
Title	Question: National Policy and Guidance
ID	EGS12154
Person ID	1160677
Full Name	Mr Paul Doughty
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

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With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

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Included files

Title	Question: National Policy and Guidance
ID	EGS12171
Person ID	1269444
Full Name	Mr & Ms Jim & Katie Barnard & Partridge

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>NPPF S11 — — There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting. — There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.</p> <p>NPPF - S60 — It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics. We are concerned the reason for this may be purely for expediency, that is to say – in order to avoid the requirement for local authorities to materially change their plans.</p> <p>— The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a ‘substantial change’ between the most recent projections and the old ones. It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed. Using out-of-date statistics means that the projections are not an ‘objectively assessed need’.</p> <p>— There is not enough effort made to find brownfield land, especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites — The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage. The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.</p> <p>NPPF Section 137 — Not enough thought has been given to options for housing that is not on the Green Belt — The estimation of windfall development is too low, evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided) — it is reasonable to project a higher amount of windfall given the rules on town centre and office developments — the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, talking pressure off the Green Belt According to the NPPF:</p>

134. Green Belt serves five purposes:
 a) to check the unrestricted sprawl of large built-up areas;
 b) to prevent neighbouring towns merging into one another;
 c) to assist in safeguarding the countryside from encroachment;
 d) to preserve the setting and special character of historic towns; and
 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

— Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

— There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS12181

Person ID 1269448

Full Name Mr John Mardell

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS12191
Person ID	399285
Full Name	Mr John Roberts
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	No - not at all because the data being used is out of date. It appears that the proposals are based on 2014 ONS housing estimates rather than the most recent 2018 estimates.
Included files	
Title	Question: National Policy and Guidance
ID	EGS12204
Person ID	1145481
Full Name	Mr Brian Kazer
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>There are several points on which the Plan is non-compliant with NPPF as regards Tring. The following list is not necessarily a complete one.</p> <p>Para 11(b) of NPPF requires “... objectively assessed needs for housing.. ”</p> <p>The number of houses proposed for Tring is in excess of the number calculated in the September 2020 South west Herts Housing Needs Assessment prepared by GL Hearn.</p> <p>No objectively assessed reason(s) for this given in the Plan.</p> <p>The Plan could be at risk of being determined as being “unsound” for this reason.</p> <p>Para 20(c) of NPPF requires “... sufficient provision for community facilities (such as health.....)”</p> <p>Regarding the combined impact of Tr01, Tr02, Tr03 population increase in Tring, I can find no evidence within the Local Plan document of any assessment of impact on capacity of existing primary care provision in Tring, nor time-scaled provision for additional primary health care facility to bridge the gap.</p> <p>Para 20(d) NPPF requires “... sufficient provision for.... conservation and enhancement of the natural environment including landscapes and green infrastructure.. ”</p> <p>At Tr01, Tr02 and Tr03, whilst the existence of existing and historic field boundary patterns is recognised, there is nothing about their conservation. Many of the hedges in all three areas are over 600 years old as determined by the standard method of number of woody species per 30 metres of hedge length, and as such should be protected by law.</p> <p>Paras 24-27 NPPF requires cooperation across administrative boundaries.</p> <p>Regarding Tr01 and proposal for warehousing, there is no evidence of any discussion with the adjoining Aylesbury Vale District Council regarding the option of using existing industrial/employment land in AVDC at College Road North just 3 miles west of Tring for that warehousing.</p>

Para 123(b) NPPF appears to require housing densities to be given. This has not been done as regards Tr01, Tr02, Tr03.

Para 174 NPPF requires mapping of wildlife corridors and linkages to existing wild/natural areas. I was unable to find evidence of such mapping for Tr01, Tr02, Tr03 within the Local Plan.

Included files

Title Question: National Policy and Guidance

ID EGS12228

Person ID 1269476

Full Name EMILY DAVIES

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment

Included files

Title Question: National Policy and Guidance

ID EGS12248

Person ID 1269479

Full Name BARBARA HARVEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

- * Yes
- * No

**QUESTIONS NPPF
comment**

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine all other reasonable options for meeting its identified need for development before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS12260
Person ID	1269482
Full Name	LOUISE JOHNSON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Government thinking is clearly in the process of changing.
Included files	
Title	Question: National Policy and Guidance
ID	EGS12264
Person ID	1227654
Full Name	Mrs Margaret Warman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	See previous comments regarding housing for older people. What you have proposed is too restricted. No mention has been made of sites being made available for those who wish to build their own homes

Included files	
Title	Question: National Policy and Guidance
ID	EGS12273
Person ID	1264925
Full Name	sharon warner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS12291
Person ID	1269485
Full Name	NICOLA HULSE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

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Included files

Title Question: National Policy and Guidance

ID EGS12296

Person ID 1269487

Full Name PAM MEGAW

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The Policy aims to protect the local environment and AONBs and this proposal seems to be taking a directly opposing view. The SE is loosing its open spaces and we really need to keep the spaces we have for future generations.
Included files	
Title	Question: National Policy and Guidance
ID	EGS12305
Person ID	1269488
Full Name	SAMANTHA SMITH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The plan isnt consistent with NPPF as it doesnt offer the protection for Greenbelt Land
Included files	
Title	Question: National Policy and Guidance
ID	EGS12342
Person ID	1269490
Full Name	MIKE WHIT
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council local plan is not based on document which has formal planning status or upon which you have carried out a proper consultation. The local plan does not comment upon the climate emergency, the environmental impact of building hundreds of houses, and considering Brownfield sites first.</p> <p>There are now expanded permitted development rights which would enable more use of commercial space, to now be used for new homes. It is not necessary to build houses on the greenbelt.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS12343
Person ID	1264637
Full Name	Ollie Parrish
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p>

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

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Included files

Title Question: National Policy and Guidance

ID EGS12358

Person ID 1269489

Full Name STEVE HILL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	The Berkhamsted Residents Action Group (BRAG) has responded in full to the consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.
Included files	
Title	Question: National Policy and Guidance
ID	EGS12370
Person ID	1269491
Full Name	Mr David Eeley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards</p>

in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b). Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance. It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS12375

Person ID 1269492

Full Name Mrs Isabelle Gorton

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “ all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

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With regard Part b) there is an expectation that the strategy “ optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport” . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS12397
Person ID	1164091
Full Name	R.J. Hollis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The plan is based on housing calculations using out of date guidance (2014 instead of 2018). The NPPF requires the authority to modify the calculated figures to take account of protecting greenbelt, AONBs and SACs, stating that housing requirements do not supercede protection of those areas. The plan clearly states that it hasn't done this.</p> <p>The framework requires development to be sympathetic with the present character of the environment, the housing figures proposed will change Tring, Northchurch and Berkhamsted fundamentally.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS12406
Person ID	1269497
Full Name	MICHAEL RUDIN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield</p>

sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in- line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS12423

Person ID 1269503

Full Name Mr Jan Wosiek

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment I DO NOT think the plan is consistent with the NPPF and supporting guidance.

Just a general comment in that bearing in mind, the Government's method of calculating housing need has been discredited, the number of dwellings required within Dacorum should reduce, hence some sections within this document need re-writing for accuracy.

Included files

Title Question: National Policy and Guidance

ID EGS12448

Person ID 1146040

Full Name Mrs Rachel Macdonald

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment

- Para 11(b) of the NPPF requires 'objectively assessed needs for housing'. The number of houses should specifically meet Dacorum's need for the full range of affordable social housing, as defined in my answer to question 1
- The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB
- Para 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.
- NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered

The proposed wildlife corridors are not explicit or mapped as required by the NPPF.

Included files

Title Question: National Policy and Guidance

ID EGS12497

Person ID 1269524

Full Name DAVID ATKINSON

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>I quote:</p> <p>Para 11(b) of the NPPF requires ‘objectively assessed needs for housing’. The number of houses should specifically meet Dacorum’s need for the full range of affordable social housing, as defined in our answer to question 1.</p> <p>The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Para 20(c) of the NPPF requires ‘sufficient provision for community facilities (such as health)’ there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.</p> <p>The proposed wildlife corridors are not explicit or mapped as required by the NPPF.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS12502
Person ID	1269525
Full Name	QUENTIN HALFYARD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS12514
Person ID	1269527
Full Name	JULIAN SMITH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a</p>

significant uplift in minimum density standards in town and city centres and other locations well served by public transport". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

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It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS12524

Person ID 1207806

Full Name Mr Chris Graebe

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment

Included files

Title Question: National Policy and Guidance

ID	EGS12585
Person ID	1269559
Full Name	Ms Jessica Giolda
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS12598
Person ID	1269561
Full Name	Mr & Mrs Martin & Tracey Martin & Tracey Read
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	NPPF S11 — — There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.

- There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.
- It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014
- The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their
- This government policy could be characterised as saying, *'If we rely on up-to-date accurate evidence, that might mean we have to change our We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.'* It is irrational to risk the Green Belt on such an ill-conceived policy.
- The housing need projections based on the most recent data **are about half of the 2014 data** (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old
- It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively
- The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target — not just to change the statistics used to suit their
- Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt
- There is not enough effort made to find brownfield land — especially as it is anticipated that

the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites

- The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the

- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum
- Not enough thought has been given to options for housing that is not on the Green Belt
- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 8 provided)
- it is reasonable to project a higher amount of windfall given the rules on town centre and office developments
- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 to check the unrestricted sprawl of large built-up areas;
- 3 to prevent neighbouring towns merging into one another;
- 4 to assist in safeguarding the countryside from encroachment;
- 5 to preserve the setting and special character of historic towns; and
- 6 to assist in urban regeneration, by encouraging the recycling of derelict and other urban

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

- There are currently over 7000 people on the housing list in That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.
- The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum
- Only 70 our of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the
- The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS12716

Person ID 1269600

Full Name Alex Marsh

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment

NPPF S11 —

— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.

- There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will

have a significant adverse effect, which has not been justified by objectively assessed need.

- It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014
 - The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their
 - This government policy could be characterised as saying, *'If we rely on up-to-date accurate evidence, that might mean we have to change our We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.'* It is irrational to risk the Green Belt on such an ill-conceived policy.
 - The housing need projections based on the most recent data **are about half of the 2014 data** (355 per annum as against 730). The only stated reason for using the old projections as opposed to the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old
 - It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively
 - The council should insist that the government uses the most accurate, and therefore up-to-date information to calculate the housing target — not just to change the statistics used to suit their
 - Using out-of-date statistics means that the projections are not an 'objectively assessed need'. — There is insufficient justification for building on the Green Belt
 - There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites
 - The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the
-
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum
 - Not enough thought has been given to options for housing that is not on the Green Belt
 - The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
 - it is reasonable to project a higher amount of windfall given that rules on town centre and office developments
 - the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 to check the unrestricted sprawl of large built-up areas;
- 3 to prevent neighbouring towns merging into one another;

- 4 to assist in safeguarding the countryside from encroachment;
- 5 to preserve the setting and special character of historic towns; and
- 6 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

- There are currently over 7000 people on the housing list in That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.
- The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum
- Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the
- The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files	
Title	Question: National Policy and Guidance
ID	EGS12728
Person ID	1269605
Full Name	Ms Hailey Woldt
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
QUESTIONS NPPF comment	There is insufficient evidence of housing need to support the level of development. Full exploitation of brownfield sites for the Local Plan is not fully evidenced. So the Plan fails to meet Section 137 of the NPPF, which specifies the exceptional circumstances that need to exist to justify changes to Green Belt boundaries.
Included files	
Title	Question: National Policy and Guidance
ID	EGS12786
Person ID	1269628
Full Name	Steven Bragg
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p>

With regard Part b) there is an expectation that the strategy ”optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS12794

Person ID 1269630

Full Name Christopher Lyne

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment No, I do not. The NPPF permits some discretion in the calculation and setting of housing target numbers. In the face of absurdly high targets, the Plan (and Borough Council) has not taken any advantage of this flexibility.

Included files	
Title	Question: National Policy and Guidance
ID	EGS12823
Person ID	1269634
Full Name	Frank Worth
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>NPPF S11 —</p> <p>— There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.</p> <p>— There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.</p> <p>NPPF - S60</p> <p>— It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics.</p> <p>— The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.</p> <p>— This government policy could be characterised as saying, ‘If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.’ It is irrational to risk the Green Belt on such an ill-conceived policy.</p> <p>— The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a ‘substantial change’ between the most recent projections and the old ones.</p> <p>— It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.</p>

- The council should insist that the government uses the most accurate, and therefore up-to-date information to calculate the housing target — not just to change the statistics used to suit their aims.
- Using out-of-date statistics means that the projections are not an ‘objectively assessed need’.
- There is insufficient justification for building on the Green Belt
- There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites
- The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt

- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
- it is reasonable to project a higher amount of windfall given the rules on town centre and office developments
- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 a) to check the unrestricted sprawl of large built-up areas;
- 3 b) to prevent neighbouring towns merging into one another;
- 4 c) to assist in safeguarding the countryside from encroachment;
- 5 d) to preserve the setting and special character of historic towns; and
- 6 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.
- Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

— We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities

— There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

— The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

— The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

— Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

— The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS12837

Person ID 1269646

Full Name Colin McHugh

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes	
* No	
QUESTIONS NPPF comment	(no comment)
Included files	
Title	Question: National Policy and Guidance
ID	EGS12850
Person ID	1145801
Full Name	Mr Guy Barlow
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The plan has failed to consider fully:</p> <p>Section 2, Achieving sustainable development, Point 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Section 3, Strategic policies, Point 20(c) of the NPPF requires ‘sufficient provision for community facilities (such as health)’ there appears to have been little assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>Section 15, Conserving and enhancing the natural environment, Point 175 NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.</p> <p>In summary the Plan isn’t consistent with NPPF because it doesn’t offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.</p>

Included files	
Title	Question: National Policy and Guidance
ID	EGS12902
Person ID	1269665
Full Name	Mr Martin Hicks
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	It is not consistent with all aims of NPPF.
Included files	
Title	Question: National Policy and Guidance
ID	EGS12917
Person ID	1207443
Full Name	Mrs Jennifer Bissmire
Organisation Details	Clerk Markyate Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	No, as for question 7,

'The Plan does not meet the needs of our communities and its ambitions will undermine the quality of life of our residents whether they live in towns, villages or rural areas. We ask that the Borough Council withdraws this Plan as it needs to be fundamentally re-shaped to reflect the Vision of the community to retain the Green Belt and the Borough's objectively assessed housing needs.'

Included files

Title Question: National Policy and Guidance

ID EGS12921

Person ID 1269666

Full Name Mr Andrew Oliver

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment As the level of housing proposed is higher than the most recent ONS data states, there is no justification for building on Green Belt land as there are no exceptional circumstances.

Only 70 houses per year of the proposed 922 are to be allocated for social housing, which is insufficient to meet Dacorum's needs.

Included files

Title Question: National Policy and Guidance

ID EGS12932

Person ID 1269677

Full Name CAROLINE CLIST

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS12945
Person ID	1269678
Full Name	GARY TRENT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS12957
Person ID	1269679
Full Name	GARY CALLUM
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS12979
Person ID	1264971
Full Name	Louise Watson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>NPPF S11-</p> <p>There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting. There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.</p> <p>NPPF – S60</p> <p>It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics. The only reason for doing this is that government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans. This government policy could be characterised as saying, ‘If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.’ It is irrational to risk the Green Belt on such an ill-conceived policy. The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a ‘substantial change’ between the most recent projections and</p>

the old ones. It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed. The council should insist that the government uses the most accurate, and therefore up-to-date information to calculate the housing target – not just to change the statistics used to suit their aims. Using out-of-date statistics means that the projections are not an ‘objectively assessed need’. There is insufficient justification for building on the Green Belt. There is not enough effort made to find brownfield land – especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites. The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 127

Not enough thought has been given to options for housing that is not on the Green Belt

The estimation of windfall development is too low – evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided) – it is reasonable to project a higher amount of windfall given the rules on town centre and office developments

The pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt According to the NPPF: 134. Green Belt serves five purposes:

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

NPPF Section 134

Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

NPPF Section 61 – Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

We need the right houses, in the right places for local people – the proposed plan seems more likely to meet the need of developers than the local communities

There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.

The Local Housing Needs Assessment (' LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.

The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents. Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS12989

Person ID 1269776

Full Name STEPHEN MACKENZIE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment

Plan does not comply with the NPPF in several respects, as identified below.

These comments relate specifically to proposals regarding Tring. There may be other parts of the Plan which are also non-compliant with the NPPF.

1 Para 11(b) of NPPF requires '... objectively assessed needs for ..'

The number of houses proposed for Tring is in excess of the number calculated in the September 2020 South West Herts Housing Needs Assessment prepared by GL Hearn.

No objectively assessed reason(s) for this given in the Plan.

The Plan could be at risk of being determined as being 'unsound' for this reason.

- 1 Para 20(c) of NPPF requires '... sufficient provision for community facilities (such as ..)'

Regarding the combined impact of Tr01, Tr02, Tr03 population increase in Tring, there appears to have been no assessment of the impact on capacity of existing primary care provision in Tring, nor time-scaled provision for additional primary healthcare facility to bridge the gap.

- 1 Para 20(d) of the NPPF requires '... sufficient provision for conservation and enhancement of the natural..... environment

including landscapes and green infrastructure. '

At Tr01, Tr02 and Tr03, whilst the existence of existing and historic field boundary patterns is recognised, there is nothing about their conservation. Many of the hedges in all three areas are over 600 years old as determined by the standard method of number of woody species per 30 metres of hedge length, and as such should be protected by law.

- 1 Paras 24-27 of NPPF require cooperation across administrative

Regarding Tr01 and proposal for warehousing, there is no evidence of any discussion with the adjoining Aylesbury Vale District Council regarding the option of using existing industrial/employment land in AVDC at College Road North just 3 miles west of Tring for that warehousing.

Taking that option could generate much more employment in Tring than warehousing by, for example, freeing up land for a residential home.

- 1 The provisions for green/wildlife corridors (especially in Tr01, 02 and 03) are confused and inadequately In particular, the corridors are poorly linked together and do not explicitly protect the hedgerows (including Marshcroft Lane) and the surrounding countryside that are a key part of the character of the area and vital to local biodiversity. Overall, the Plan for Tring falls short of NPPF para 147, and paras 99/100.

- 1 NPPF requires that development on Green Belt land achieves net environmental gain (NPPF para 72c) and is mitigated by compensating development of surrounding natural spaces; there is no evidence that this has been adequately Although considered for NT Ashridge, it is not considered regarding the key 'honey pots' of Tring Park, Stubbings Wood or College Lake.

- 1 Housing densities on Tr01, Tr02 and Tr03 are not stated, despite seemingly being required by NPPF para

- 1 To meet NFFP requirements, 'wildlife corridors' need to be made explicit and mapped (NPPF para174), along with their linkage to existing wild/natural This has not been done in the Plan.
- 1 Policy There is no timescale given for any of the numbers (overall or by site) for the proposed housing sites in Tring, and yet these must exist as the overall growth for Dacorum is profiled by year. Why is this not stated, as required by NPPF para73?

Included files

Title Question: National Policy and Guidance

ID EGS13002

Person ID 1059698

Full Name Mr Richard Lyne

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment No, I do not. The NPPF permits some discretion in the calculation and setting of housing target numbers. In the face of absurdly high targets, the Plan (and Borough Council) has not taken any advantage of this flexibility.

Included files

Title Question: National Policy and Guidance

ID EGS13011

Person ID 330928

Full Name Mr James Gregory

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS13023
Person ID	1164731
Full Name	Deborah Turnbull
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p>

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified

Included files	
Title	Question: National Policy and Guidance
ID	EGS13038
Person ID	1270011
Full Name	Mrs Nicola Davis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTIONS NPPF comment	There is insufficient provision for community facilities. We no longer have a Police station and we don't have enough primary care facilities.
Included files	
Title	Question: National Policy and Guidance
ID	EGS13061
Person ID	1270013
Full Name	Mr Daniel Ritchie
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<ul style="list-style-type: none"> • Para 11(b) of the NPPF requires 'objectively assessed needs for housing'. The number of houses should specifically meet Dacorum's need for the full range of affordable social housing, as defined in my answer to question 1. • The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB. • Para 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap. • NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered. <p>The proposed wildlife corridors are not explicit or mapped as required by the NPPF.</p>
Included files	

Title	Question: National Policy and Guidance
ID	EGS13076
Person ID	1270019
Full Name	Ms Clare Kirwan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	(no comment)
Included files	

Title	Question: National Policy and Guidance
ID	EGS13086
Person ID	1270032
Full Name	MRS JILLY HENRY
Organisation Details	
Agent ID	1270033
Agent Full Name	MR JOHN C.E. PHILLIPS
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The draft plan is inconsistent with the duty set out in paragraphs 24 -27 of the NPPF for authorities to co-operate with each other on strategic matters. It is clear that the delivery of sufficient housing to meet the future housing needs of Dacorum is a strategic matter particularly given the location of the Borough in relation to London and its neighbouring

Districts. It is understood that this was recognised by the Council and the adjacent authorities in establishing the mechanism of the South West Hertfordshire Joint Strategic Plan. However it would appear that no meaningful work on that plan has taken place and since March 2020 its working arrangements have been moribund and no work has therefore taken place to fulfil the obligations clearly set out in the NPPF. This is particularly important given that the existing local plan is out of date and itself fails to meet the obligations and policies contained in the NPPF particularly as they relate to the calculation of housing need.

The draft plan is also inconsistent with section 5 of the NPPF, 'Delivering a sufficient supply of homes'. The Plan is not based on a clear, objective assessment of local housing need using the standard method as required by para 60 of the NPPF. This would appear to be recognised by the Council itself at several points within the text of the draft plan. Our preliminary estimate is that the plan significantly underestimates the housing need for which the plan should make provision by up to 30% and that if the plan is to be made consistent with the NPPF additional land for housing needs has to be identified and allocations made.

Although we consider the draft plan to be inconsistent with the NPPF in respect of both the duty to co-operate with neighbouring authorities and the quantum of housing for which the draft plan makes provision, nevertheless in terms of the broad distribution of development we consider that the draft plan is consistent with the NPPF and Government policy in that it seeks to concentrate most development in and around the larger settlements where services and facilities can be accessed by all modes of transport and facilities can be most economically and sustainably provided. In this respect it is considered that the identification of Berkhamsted as one of the settlements where growth is to be concentrated is consistent with that strategy and is sustainable. The town contains a broad range of facilities and services and can be accessed by all transport modes including mainline rail services. Further growth also provides the opportunity to most effectively invest in maintaining and improving facilities as part of a sustainable strategy for the District. In this respect therefore the identification of Berkhamsted as one of the settlements where growth is to be concentrated is strongly supported.

Included files	
Title	Question: National Policy and Guidance
ID	EGS13104
Person ID	1270037
Full Name	MRS GINA BARLOW
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
QUESTIONS NPPF comment	<p>The plan has failed to consider fully: Section 2, Achieving sustainable development, Point 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Section 3, Strategic policies, Point 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been little assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>Section 15, Conserving and enhancing the natural environment, Point 175 NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.</p> <p>In summary the Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS13109
Person ID	1264860
Full Name	Alan Coughtrey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
QUESTIONS NPPF comment	<p>Protecting Green Belt land & Conserving and enhancing the natural environment</p> <p>The plan should guarantee the protection of existing natural habitats, the plan has not given sufficient weight to these sections of guidance in the National Planning Policy Framework (NPPF)</p>
Included files	
Title	Question: National Policy and Guidance

ID	EGS13123
Person ID	1264860
Full Name	Alan Coughtrey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The plan has failed to consider fully: Section 2, Achieving sustainable development, Point 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Strategic policies, Point 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been little assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>Section 15, Conserving and enhancing the natural environment, Point 175 NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS13125
Person ID	1270061
Full Name	Mrs Coughtrey
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Protecting Green Belt land & Conserving and enhancing the natural environment The plan should guarantee the protection of existing natural habitats, the plan has not given sufficient weight to these sections of guidance in the National Planning Policy Framework (NPPF)
Included files	
Title	Question: National Policy and Guidance
ID	EGS13139
Person ID	1270061
Full Name	Mrs Coughtrey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The plan has failed to consider fully:</p> <p>Section 2, Achieving sustainable development, Point 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <p>Strategic policies, Point 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been little assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.</p> <p>Section 15, Conserving and enhancing the natural environment, Point 175 NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered.</p>

Included files	
Title	Question: National Policy and Guidance
ID	EGS13153
Person ID	1270066
Full Name	Dr Amanda Cole
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine all other reasonable options for meeting its identified need for development before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted</p>

in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS13173

Person ID 1270069

Full Name Patrick Moloney

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

NPPF S11 —

- There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting.
- There has been insufficient account taken of objectively assessed It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

- It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014
- The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans.
- This government policy could be characterised as saying, *'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.'* It is irrational to risk the Green Belt on such an ill-conceived policy.
- The housing need projections based on the most recent data **are about half of the 2014 data** (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.
- It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.
- The council should insist that the government uses the most accurate, and therefore up-to-date information to calculate the housing target — not just to change the statistics used to suit their aims.
- Using out-of-date statistics means that the projections are not an 'objectively assessed need'.
- There is insufficient justification for building on the Green Belt
- There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites
- The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt
- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
- it is reasonable to project a higher amount of windfall given the rules on town centre and office developments
- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 to check the unrestricted sprawl of large built-up areas;
- 3 to prevent neighbouring towns merging into one another;
- 4 to assist in safeguarding the countryside from encroachment;
- 5 to preserve the setting and special character of historic towns; and
- 6 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

- **We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities**
- There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for The proposed local plan does not meet this need.
- The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.
- Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.
- The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS13187

Person ID 1144725

Full Name Mr Philip Anderson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

<p>Yes / No * Yes * No</p>	<p>No</p>
<p>QUESTIONS NPPF comment</p>	<p>NPPF S11 —</p> <ul style="list-style-type: none"> • There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting. • There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need. <p>NPPF - S60</p> <ul style="list-style-type: none"> • It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics. • The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans. • This government policy could be characterised as saying, <i>'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.'</i> It is irrational to risk the Green Belt on such an ill-conceived policy. • The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones. • It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed. • The council should insist that the government uses the most accurate, and therefore up-to- date information to calculate the housing target — not just to change the statistics used to suit their aims.

- Using out-of-date statistics means that the projections are not an 'objectively assessed need'.
- There is insufficient justification for building on the Green Belt
- There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites
- The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt
- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
- it is reasonable to project a higher amount of windfall given that rules on town centre and office developments
- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

134. Green Belt serves five purposes:

- 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

NPPF Section 134

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

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- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

- **We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities**
- There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for The proposed local plan does not meet this need.
- The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.
- Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.

- The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS13204

Person ID 1270127

Full Name Amy Moloney

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment

NPPF S11 —

- There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting
- There has been insufficient account taken of objectively assessed It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60

- It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics
- The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans
- This government policy could be characterised as saying, *'If we rely on up-to-date accurate evidence, that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.'* It is irrational to risk the Green Belt on such an ill-conceived policy.
- The housing need projections based on the most recent data **are about half of the 2014 data** (355 per annum as against 730). The only stated reason for using the old projections as opposed the up-to-date projections, is because there is a 'substantial change' between the most recent projections and the old ones.
- It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed.

- The council should insist that the government uses the most accurate, and therefore up-to-date information to calculate the housing target — not just to change the statistics used to suit their aims.
- Using out-of-date statistics means that the projections are not an ‘objectively assessed need’.
- There is insufficient justification for building on the Green Belt
- There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites
- The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage.
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137

- Not enough thought has been given to options for housing that is not on the Green Belt
- The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)
- it is reasonable to project a higher amount of windfall given the rules on town centre and office developments
- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 to check the unrestricted sprawl of large built-up areas;
- 3 to prevent neighbouring towns merging into one another;
- 4 to assist in safeguarding the countryside from encroachment;
- 5 to preserve the setting and special character of historic towns; and
- 6 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

NPPF Section 134

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

- **We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities**
- There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for The proposed local plan does not meet this need.
- The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing
- The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.
- Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA
- The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities

Included files

Title Question: National Policy and Guidance

ID EGS13223

Person ID 1270128

Full Name Richard Salway

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

- Para 11(b) of the NPPF requires 'objectively assessed needs for housing'. The number of houses should specifically meet Dacorum's need for the full range of affordable social housing, as defined in my answer to question 1.
- The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.
- Para 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' but there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.
- NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces; there is no evidence that this has been adequately considered.

The proposed wildlife corridors are not explicit or mapped as required by the NPPF.

Included files

Title Question: National Policy and Guidance

ID EGS13237

Person ID 1258764

Full Name Mark Bullard

Organisation Details Tring Squash Club

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

Included files

Title Question: National Policy and Guidance

ID EGS13244

Person ID 1270143

Full Name Mr Thomas Parsons

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment

Included files	
Title	Question: National Policy and Guidance
ID	EGS13264
Person ID	1270148
Full Name	Mr Carl Blackwell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and</p>

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS13288

Person ID 1270157

Full Name Ms Claire Laing

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport" . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS13292
Person ID	1270175
Full Name	Mr Chris Bugden
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	(no comment)
Included files	
Title	Question: National Policy and Guidance
ID	EGS13318
Person ID	1270198
Full Name	Mr Hilary Curtis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS13334
Person ID	1270200
Full Name	Mr Richard Harman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	
QUESTIONS NPPF comment	(27) National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS13346
Person ID	1270207
Full Name	Ms Helena Thorpe Foulsham
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS13357
Person ID	490211
Full Name	Ms Barbara Saville
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

<p>Yes / No</p> <p>* Yes</p> <p>* No</p>	
<p>QUESTIONS NPPF comment</p>	<p>NPPF S11 —</p> <ul style="list-style-type: none"> • There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting. • There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse effect, which has not been justified by objectively assessed need. <p>NPPF - S60</p> <ul style="list-style-type: none"> • It does not make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics. • The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans. • This government policy could be characterised as saying, <i>'If we rely on up-to-date accurate evidence that might mean we have to change our plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.'</i> It is irrational to risk the Green Belt on such an ill-conceived policy. • The housing need projections based on the most recent data are about half of the 2014 data (355 per annum as against 730). The only stated reason for using the old projections as opposed to the up-to-date projections is because there is a 'substantial change' between the most recent projections and the old ones. • It is unreasonable to say that projections based on statistics chosen precisely because they justify out-of-date-projections rather than more accurate up-to-date projections are objectively assessed. • The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target — not just to change the statistics used to suit their aims. • Using out-of-date statistics means that the projections are not an 'objectively assessed need'. • There is insufficient justification for building on the Green Belt • There is not enough effort made to find brownfield land — especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites • The proportion of social housing is far too low — there are 7000 people currently on the housing register — these are people who qualify for social housing but cannot get it because of the shortage. • The Local Plan does not include sufficient allocations for affordable or social housing for the needs of Dacorum residents. <p>NPPF Section 137</p> <ul style="list-style-type: none"> • Not enough thought has been given to options for housing that is not on the Green Belt • The estimation of windfall development is too low - evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided)

- it is reasonable to project a higher amount of windfall given that rules on town centre and office developments
- the pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt

According to the NPPF:

- 1 Green Belt serves five purposes:
- 2 a) to check the unrestricted sprawl of large built-up areas;
- 3 b) to prevent neighbouring towns merging into one another;
- 4 c) to assist in safeguarding the countryside from encroachment;
- 5 d) to preserve the setting and special character of historic towns; and
- 6 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

- Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for the number of dwellings.

- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

- **We need the right houses, in the right places for local people — the proposed plan seems more likely to meet the need of developers than the local communities**
- There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need.
- The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing.
- The Local Plan does not include sufficient allocations for affordable or social housing for the needs of Dacorum residents.

- Only 70 out of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA.
- The developer-led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files

Title Question: National Policy and Guidance

ID EGS13371

Person ID 924129

Full Name Mrs Natalia McIntosh

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment (27) National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.

Included files

Title Question: National Policy and Guidance

ID EGS13384

Person ID 1270224

Full Name Ms Heather Wignall

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

**QUESTIONS NPPF
comment**

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development// before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “ optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Barkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title	Question: National Policy and Guidance
ID	EGS13399
Person ID	1153922
Full Name	Roger Hyslop
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	(27) National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	

Title	Question: National Policy and Guidance
ID	EGS13409
Person ID	1270229
Full Name	Homes England
Organisation Details	
Agent ID	1270231
Agent Full Name	Ms Rebecca Dewey
Agent Organisation	Associate Director WSP
Yes / No * Yes * No	
QUESTIONS NPPF comment	Only in part, please see our responses to questions 2, 3, 4, 5, 6 and 7.

The Council notes at paragraph 7.5 that it has progressed the Draft Plan on the basis on a housing need calculation of 922 dwellings per annum (dpa), which uses the method set out within the Government consultation as part of the Planning Reform White Paper (Autumn 2020). The Council acknowledges that there are uncertainties over using this figure and that there may be further changes set out by the Government and that it will be kept under review.

On 16 December 2020, the Government confirmed that councils should use an updated method which takes the original standard method and adds a 35% uplift for boroughs which contain the top 20 largest cities and urban areas (Planning Practice Guidance (PPG) paragraph reference ID: 2a- 004-20201216). This means that the housing need figure for Dacorum will revert back to 1,023dpa:

- The increase from 922dpa to 1,023dpa results in a total requirement of 18,414 homes across the Plan
- This is an increase of 1,818 homes above the 16,596 figure set out within the Draft At present, the Draft Plan contains a supply of 16,899 homes over the Plan Period, only marginally above the DBC's need when using the 922dpa figure.

As such, the DBC will need to update the Plan and find additional sources of housing supply in order to accommodate the higher level of need.

DBC will also need to update its Sustainability Appraisal. Currently, Options A to D are based on a housing target of 922dpa and only Option E considers a higher target of 1,100dpa. Option E does not specify a particular spatial strategy, so this will need to be addressed before the publication of the Regulation 19 Local Plan.

National guidance requires DBC to meet this need in full. There is a historic undersupply of housing in the area and the Council is currently unable to demonstrate a five-year supply of land for housing.

WSP understand that the latest calculation is that DBC can only demonstrate 2.8 years of housing land supply¹. This housing land supply calculation is based on the current housing target of 403dpa. With the emerging housing need of 1,023dpa set to increase this target by over 150%, the Council's housing land supply will fall to an even more critical level.

The 2020 Housing Delivery Test results, published on 19 January 2021, show that there has been a big reduction in housing delivery in DBC. The 2019 results showed that the Council was delivering 138% against its housing requirement but this dropped by 49% to 89% in the 2020 results. We understand that this means that the Council will now have to prepare an Action Plan to show how it will deliver the housing it needs.

Last year, DBC delivered just 522 homes against a target of 938dpa. This target was temporarily reduced by the Government from 1,023dpa, with a month's worth of demand being taken off due to the COVID pandemic. The next results will be based on a requirement of 1,023dpa and will require the Council to substantially increase housing delivery in order to avoid being hit with the requirement to add a 20% buffer to its housing target or face the most severe penalty, the "presumption in favour of sustainable development".

Further, affordability within DBC has worsened significantly over the last 10 years. The ratio of median house price earnings to median gross annual workplace-based earnings has gone up from 7.88 in 2009 to 12.21 in 2019, an increase of nearly 55%².

The issue of worsening affordability shows an acute need for housing placing greater emphasis on the council to exceed its housing requirement. As such, the Council should amend the Plan in order to meet in excess of 18,414 homes over the specified period.

We support Bovingdon as being classified as a “LARGE Village” in the settlement hierarchy and note the contribution that allocated sites within the settlement can make towards providing much needed housing, in a sustainable way.

Our comments relate to the Draft Plan Growth Area Bv02 - Chesham Road and Molyneaux Avenue, which comprises land owned by Homes England.

We can confirm that Homes England are undertaking technical studies of their landholding to support the disposal of the site and ultimately the submission of a planning application for residential development.

The site comprises the adopted housing allocation known as Chesham Road and Molyneaux Avenue (Policy LA6), situated in Bovingdon; south of the main built footprint of Her Majesty’s Prison The Mount (“HMP The Mount”) and Bovingdon Airfield. The north eastern/eastern boundaries are shared with an existing drainage reservoir and beyond that, residential neighbourhood. Residential development also bounds the site opposite at Chesham Road. The site is located on the edge of the built footprint of Bovingdon and was removed from the Green Belt to enable the site’s development. The site currently comprises undeveloped land, formerly Crown Property, associated with HMP The Mount and now owned by Homes England.

The site forms a border with the Green Belt to the north and west and is located wholly in Flood Zone 1, which is the flood zone most compatible with residential development. The site is not located within a conservation area and there are no heritage assets on or in proximity to the site; the nearest designated heritage asset being the Grade II Listed White Hart Cottage, located circa 350m west of the site.

There are three main aspects to our representations, as detailed below:

- Remove restriction to building height;
- Maximise the delivery of the site providing up to 60 homes;
- Landownership and

In summary, our comment on the draft allocation of Growth Area Bv02 is that it is too prescriptive and does not meet the test of soundness by failing to plan positively, artificially limiting the site’s capacity and its ability to contribute to meeting the area’s objectively assessed needs. The policy is inconsistent with national policy which requires plans to positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change (NPPF 2019, Paragraph 11).

Draft allocation Growth Area Bv02 provides urban design principles to guide the site’s future development. The allocation seeks to limit development on the site to two-storeys in height, based upon the safeguarding zones for the air traffic control navigation beacon at Bovingdon Airfield.

To support this, the Council have published the National Air Traffic Service (‘NATS’) consultation zones for Bovingdon onto the data.gov.uk website here; however, the data is overlaid on an indicative map and the nature of this makes it

difficult to interpret the specific boundary lines of the zones (see Figure 1). The map key is as follows, with coloured zones referring to the scale of development that requires consultation:

- Black star: approximate location of site Bv02;
- Red: any development, above ground level;
- Yellow: any development, over 10m in height; and
- Green: any development, over 15m in height

Figure 1: NATS Consultation Zones in Bovingdon³

The data.gov website comprises the only form of evidence supporting the Council's restriction on development heights; however, this data requests NATS consultation for development of certain heights or above, rather than enforcing a definitive limit on development heights.

Based on the safeguarding zones, confidential pre-application consultation has been undertaken with NATS regarding the proposals for Growth Area Bv02. It was concluded that NATS would not object to the principle of development at the site up to 175m above mean sea level (see confidential **Appendix B**).

To further support the site's redevelopment, in conjunction with advice from the relevant statutory consultee, we request that the allocation wording is amended to remove this limitation on scale. It is an incorrect application of the consultation zone data and, is superseded by the response issued by NATS. The policy wording as drafted is therefore in conflict with Paragraph 35b of the NPPF.

In addition, Figure 1 clearly identifies HMP The Mount as being situated within greater proximity to the beacon and within the consultation zones, yet it is densely developed and to greater heights. A scheme in a growth area should be design and context led, having due regard to consultation that might be necessary with NATS. Further, increasing the development heights will support increased densities.

3 NATS Bovingdon Safeguarding Zones, Dacorum Borough Council (last updated: 20 October 2015)

Due to the proposed draft wording of Growth Area Bv02, the Plan, is not sound, per paragraph 35b of the NPPF, which states that Plans must be justified, based upon proportionate evidence. As established, the current evidence base that this proposal is using comprises an indicative map and that requires the consultation of NATS where developments seek heights above specified thresholds. In order to be found sound, the Draft Plan would have to consider and reflect the recent advice from consultation with NATS in the policy wording for Growth Area Bv02, removing the limitations of two storeys.

Dacorum Borough Council's Site Allocations DPD (adopted July 2017) contains a policy for the Chesham Road / Molyneaux Avenue site (Policy LA6), together with a vision, an indicative spatial layout, and a series of development principles. The allocation identified that the site would deliver 60 new dwellings and open space. The existing allocation (LA6) is proposed for reallocation in the Emerging Strategy for Growth; however, the draft allocation, Growth Area Bv02 – Chesham Road and Molyneaux Avenue, seeks to reduce the capacity of the site by 20 dwellings, to around 40 dwellings (subject to masterplanning) and public open space

There has been no evidence provided to justify this reduction in the site's capacity and in light of the new evidence we present that building height should not be restricted, inter alia the undersupply of housing, there is justification to increase the capacity of the site:

- The gross area of the site is 0ha
- At a reasonable gross density of 30 dpha
- Would suggest a capacity of 60 dwellings (net density of 40 dpha)

This capacity assumes 0.5 ha of POS (inc play space) as per draft Policy DM63.

Retaining capacity on existing, deliverable land allocations, assists the Council in meeting the housing shortfall.

In summary, the Draft Plan's reduction of capacity from 60 to 40 dwellings does not appear to be supported by evidence to justify the amended allocation, nor does it support the Council's undersupply of housing, requiring an additional 1,818 homes be found to support the borough's demand. Therefore, the amended allocation is contrary to Paragraph 35b of the NPPF.

We note that the revised wording for the site's allocation (p.331) suggests:

"Access to be provided from Molyneaux Avenue, with pedestrian access from Chesham Road.

Provide for cycle and pedestrian access to Hyde Lane and Lancaster Drive."

Whilst we understand the benefit of good connections with the existing network, we will be limited by the constraints of landownership and whether the roads are adopted. Therefore, we suggest rewording the proposed text to allow for flexibility, until such time that the feasibility of these connections has been tested through design work. It may also be possible to provide vehicular access from Chesham Road and Lancaster Drive, subject to highway assessment, so this should also be reflected in the next draft version of the Plan.

FLOOD RISK AND DRAINAGE

For clarity the water body referred to as a reservoir is outside of the Homes England's ownership, as per the original allocation and the redline of the proposed reallocation should be adjusted accordingly (see **Appendix C**). Furthermore, this water body should be referred to as an infiltration basin - our technical due diligence suggests that it has also never been used for storage for reuse, but attenuation and discharge via infiltration. The infiltration basin is also under the minimum size (25,000 cubic metres) for it to be designated as a reservoir under the 1975 Reservoir Act.

The Draft Plan seeks to control the flood risk and drainage management at for Growth Area Bv02 in relation to its neighbour, HMP The Mount, and the neighbouring infiltration basin to the east of the site. The site does not comprise the infiltration basin, as clarified in **Appendix C**.

The draft policy states:

"Ensure that drainage infrastructure associated with HMP The Mount and the adjacent holding reservoir for Bovingdon are maintained and where necessary, enhanced."

The use of the word “maintain” suggests two-fold; that the infiltration basin should be kept; and that it should be maintained (i.e. landscaping kept under control / to a certain standard). The basin is not within Homes England’s ownership as per the original allocation, so this commitment cannot be reasonably made.

In seeking to control the maintenance and enhancement of the neighbouring infiltration basin the policy is unsound, contrary to Paragraph 35d of the NPPF. To ensure a sound Plan, the policy wording should be amended, as well as updates made to the Draft Dacorum Infrastructure Delivery Plan (November 2020) to remove reference to off-site works.

The drainage and flood risk required in relation to the new homes will evolve through liaison and engagement with the Lead Local Flood Authority, as standard - the infiltration basin is not required by the development.

No. As per our response at Question 2, the Evidence Base is primarily outdated and unreliable based upon its reliance on outdated housing numbers, as well as its incorrect interpretation of the NATS consultation zones, and the inclusion of HMP The Mount’s drainage infrastructure and infiltration basin within Growth Area Bv02.

The Development Strategy Background Topic Paper (November 2020) is incorrect in its reference to a major constraint of the possible redevelopment at Bovingdon Airfield as the requirement to overcome the “*height restriction associated with the air traffic control (NATS) navigation beacon at Bovingdon Airfield*”. As detailed within our response to Question 5, this is an incorrect interpretation of the data and should be reconsidered in the context of our correspondence and consultation with NATS.

Appendix A of the Urban Capacity Study (incl. Windfall Assessment) (November 2020) is outdated, incorrectly highlighting a larger development area than proposed (**Appendix C**), including the drainage soakaways and infiltration basin associated with HMP The Mount. In addition, it seeks to lower the expected housing delivery to 40 dwellings without technical evidence and contrary to the opinion of the landowner.

Table 75: Bovingdon summary of key infrastructure requirements, of the Draft Dacorum Infrastructure Delivery Plan (November 2020) and the ‘Draft Infrastructure Delivery Plan – November 2020 – Settlement Schedule for Bovingdon, note “*Ensure the drainage infrastructure associated with HMP The Mount and the adjacent holding reservoir for Bovingdon are maintained and where necessary, enhanced (Bv02)*”. It also makes references to the provision of a site of 40 dwellings.

The AECOM site assessments were also each considered against a lower housing need for the Borough, allowing for the discounting of sites which could support the sustainable development of the Council. Further, the Urban Capacity Study (November 2020) estimated capacity within the existing settlements at 10,440 homes, below the level of housing required. The Site Selection Topic Paper (November 2020), interrogates the level of urban capacity available, including existing allocations, commitments, and windfall allowances. Concluding that 10,954 dwellings can be expected to be delivered within the urban areas (note this is slightly different from the number set out within the Urban Capacity Study). This is 7,460 dwellings short of the housing requirement of 18,414 dwellings (based on 1,023dpa).

The issues outlined above with the supporting Evidence Base, in addition to our response to question 2-7, show that in addition to the interpretation of NATS consultation zones, the change in housing requirement has resulted in the need for extensive updates to the Evidence Base and Draft Plan.

Title	Question: National Policy and Guidance
ID	EGS13428
Person ID	1270261
Full Name	MRS SAFFRON MURRAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	

Title	Question: National Policy and Guidance
ID	EGS13449
Person ID	1270264
Full Name	MRS JANE BROWN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Evidenced information on full and satisfactory use of brownfield sites for development needs to be provided, otherwise there is no justification for developing Green Belt land, especially on the scale proposed for east of Tring.
Included files	

Title	Question: National Policy and Guidance
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ID	EGS13453
Person ID	1270263
Full Name	MRS SHARON O'SULLIVAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>See comments under Question 4 regarding NPPF Paragraph 11b), in relation to Green Belt and AONB land, which provides "a strong reason for restricting the overall scale, type and distribution of development"</p> <p>The plan fails to comply with the NPPF, with Government guidance, Ministerial Written Statement and the revised indicative housing need figure for Dacorum issued on the 16th December 2020. Such a significant change in Government policy and resulting guidance was issued after this version of the Local Plan was published making it out of date and in need of revision before submission</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS13462
Person ID	1264853
Full Name	Nick Davis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTIONS NPPF comment	NPPF guidelines require a sufficient provision for community facilities. There are no plans to create or extend current primary care facilities, or re-establish a Police station the town had until recent years. That obviously, got replaced with housing.
Included files	
Title	Question: National Policy and Guidance
ID	EGS13476
Person ID	1270266
Full Name	VANDA EMERY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	No Comment, as NPPF is also flawed as it hasn't been revised in line with changes needed to for country to meet it's legally binding Zero Carbon Target.
Included files	
Title	Question: National Policy and Guidance
ID	EGS13503
Person ID	1270278
Full Name	CHRISTOPHER COOK
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS13517
Person ID	1270285
Full Name	MARTIN WELLER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and</p>

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS13528

Person ID 1270291

Full Name Mr Mark Smith

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

QUESTIONS NPPF comment It seems like the number of properties planned for the area are excessive compared to other areas.

Included files

Title Question: National Policy and Guidance

ID EGS13557

Person ID 1260521

Full Name Steve Ritchie

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<ul style="list-style-type: none"> • Para 11(b) of the NPPF requires ‘objectively assessed needs for housing’. The number of houses should specifically meet Dacorum’s need for the full range of affordable social housing, as defined in my answer to question 1. • The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB. • Para 20(c) of the NPPF requires ‘sufficient provision for community facilities (such as health)’ there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap. • NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered. • The proposed wildlife corridors are not explicit or mapped as required by the NPPF.
Included files	
Title	Question: National Policy and Guidance
ID	EGS13575
Person ID	1227768
Full Name	Ms Denise Young
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance

ID	EGS13595
Person ID	1270310
Full Name	Ms Eleanor Jelf
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	NPPF requires exceptional circumstances for building on the Green Belt – this requirement has not been fully evidenced or justified in the Local Plan. Nor has the council made use of footnote 6, paragraph 11 which enables housing numbers to be reduced where there would be a detrimental impact on the Green Belt and/or AONB.
Included files	
Title	Question: National Policy and Guidance
ID	EGS13631
Person ID	1145871
Full Name	Mr Gareth Morris
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b) i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS13644

Person ID 1270343

Full Name KEITH DELDERFIELD

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p> <p>It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS13705

Person ID	1270361
Full Name	Mr Jon Whysall
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS13719
Person ID	1263002
Full Name	Rhona Denness
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>I agree with the following statements within the Grove Fields Residents Association response to the Local Plan:</p> <p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p>

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS13733
Person ID	223941
Full Name	Mrs Cathy Davidson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

**QUESTIONS NPPF
comment**

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development " before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport " . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

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Included files

Title

Question: National Policy and Guidance

ID

EGS13741

Person ID

1270365

Full Name

Trustees of Gaddesden Estate

Organisation Details

Trustees of Gaddesden Estate (GaddesdenTrust)

Agent ID

1270367

Agent Full Name

Mr
David

Fletcher

Agent Organisation

Director – National Development & Planning
Strutt and Parker

Yes / No

* Yes

* No

**QUESTIONS NPPF
comment**

This representation has provided a review of the current Dacorum Borough Council Preferred Options Local Plan on behalf of the Trustees of the Gaddesden The Plan is considered to be unsound in its current form and does not accord with national policy. The current plan is considered to be unsound on the basis that the proposed allocations of sites HH01 and HH02 are not the most appropriate allocations when considered against the alternatives.

Policies HH01 and HH02, which relate to the proposed Garden Communities are considered to be unsound for the following reasons:

- HH01 and HH02, along with the proposed urban extensions to Berkhamstead and Tring, place a significant reliance on large strategic sites to deliver the vast majority of the housing requirements for the plan period. This creates a number of issues, including a lack of completion for market housing, over- saturation of housing and employment in a very limited number of locations. The plan is also not currently meeting the NPPF requirement to allocate a substantial proportion of small and medium sized sites to meet Dacorum’s housing land. HH01 and HH02 also place an over reliance on Hemel Hempstead for housing delivery, which should be more evenly distributed
- HH01 and HH02 are located immediately adjacent to the Chiterns AONB. In accordance with paragraph 71 and 172 of the NPPF, development should be situated away from the AONB. It is unclear why North Hemel has been selected above alternative sites to the south of the Borough, which could be allocated without impacting upon the AONB. The allocations of HH01 and HH02 have also not fully considered visitor pressure on the AONB
- HH01 and HH02 will require substantial new infrastructure, including a new bypass, which raise significant deliverability issues. The south side of Hemel Hempstead benefits from significantly improved transport connectivity to the A41 and M25 and it is not clear why HH01 and HH02 have been chosen above alternative options in this regard.
- The housing figures used to calculate demand for housing, are based on out of date ONS figures and the plan has also not provided an assessment of Covid-19, which could free up additional employment floor space for residential development.
- The proposed development has the potential to have a carbon footprint and it is very important that the full environmental impact of the development is fully assessed

Notwithstanding our view that HH01 and HH02 should be removed as allocations from the Local Plan, in the event that HH01 and HH02 are retained within the plan, it is imperative that the current policy wording is amended in order to give suitable protection to the AONB, neighbouring receptors and the setting of nearby listed The suggested changes are set out within section 3 of this representation.

Included files	
Title	Question: National Policy and Guidance
ID	EGS13750
Person ID	1270368
Full Name	Mr Charlie Laing
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport" . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements</p>

in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS13780

Person ID 1270380

Full Name Mrs Samantha Weston

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

QUESTIONS NPPF comment (no comment)

Included files

Title Question: National Policy and Guidance

ID EGS13792

Person ID

Full Name

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS13809
Person ID	1163978
Full Name	John Wignall
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development " before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that</p>

nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport ". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan ' s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS13821

Person ID 1270385

Full Name Ms Katy Regan

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes
* No

**QUESTIONS NPPF
comment**

No, due consideration has not been given to policies which protect assets such as green belt and AoNB.

Objectively Assessed Need

The National Planning Policy Framework requires that all planning authorities prepare Local Plans to provide housing which meets their objectively assessed need.

1 Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

(a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

(b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas 5 , unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 6 ; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

NPPF section 11

Section 60 of the NPPF suggests that the housing need is set by the standard method. However, the housing figure from the standard method for Dacorum has changed during the course of this consultation.

1 To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

NPPF section 60

In November 2020 Dacorum had a standard method ‘housing target’ of 922 dwellings per annum. This was based on the most recent Office for National Statistics (‘ONS’) housing need projections, (355 per year averaged over the next ten years for Dacorum) and uplifted by an algorithm which placed import, not only on housing affordability, but also on the change in housing affordability in the last ten years. This resulted in a multiplier applied to the ONS projected need of 2.6, and overall housing target of 922 dwellings per annum.

In December 2020, Government announced that it would no longer be using this method to calculate the housing target and that it would revert to an earlier affordability algorithm. This algorithm limited the uplift from ONS figures to 1.4 x

ONS figures. With the latest ONS figures suggesting that Dacorum would need 355 dwellings per year this would provide a housing need figure of around 500 dwellings per annum. However, rather than use the latest projections, Government announced that it would instead revert to the 2014 projections.

‘We will continue to use the 2014-based household projections. The government has carefully considered whether to use the 2018-based household projections and has concluded that, due to the substantial change in the distribution of housing need that would arise as a result, in the interests of stability for local planning and for local communities, it will continue to expect only the use of the 2014-based projections.’

Government response to the local housing need proposals in ‘Changes to the current planning system’

As the latest housing need projections for Dacorum are around half the 2014 ones (355 vs 730)

using out of date 2014 projections results in a ‘housing target’ figure for Dacorum of 1023 dwellings per annum. It is specifically stated that the reason for using the old projections is because there is a ‘substantial change’ between the old projections and the most recent ones.

Therefore, it is self-evident that the housing target produced by the standard method cannot be accurately described as an objectively assessed need.

We urge the Council to request of Government, that the best information available be used to calculate our housing target. That is, the most recent ONS figures, and the standard method (which limits uplift to a multiplier of 1.4).

If Government does not agree to alter the Standard Method across the country to reflect more recent trends, the NPPF section 60 allows for planning authorities to set their own housing need under ‘exceptional circumstances’.

It is our view that the fact that the target figure set by using the 2014 projections is not in any way an ‘objectively assessed need’, combined with the fact that providing for over double the actual required need would fundamentally fly against the UKs 2050 net zero commitment, provides this exceptional circumstance to apply an alternative approach to calculating the housing need.

It is our considered view that as such, DBC should use the latest housing projections, along with the original standard method to calculate its housing need, and update this local plan to provide for a 9,000 homes over 18 years.

Protected areas

If the housing target provided by the current standard method and old ONS projections must be used, it is clear from the NPPF and the recent release from MHCLG that this target is considered only a starting point.

11 b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

- 1 the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
- 2 any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

NPPF section 11

‘Many respondents to the consultation were concerned that the ‘targets’ provided by the standard method were not appropriate for individual local authority areas. Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt.’

Government response to the local housing need proposals in ‘Changes to the current planning system’

On top of this, it is worth noting that the reasons given by MHCLG for rejecting the complex housing algorithm (which for Dacorum gave a target figure of 2.6 x the ONS projected housing need) focused on the pressure on rural areas and Green belt.

‘In particular, we heard that too much strain was being put on our rural areas and not enough focus was on the renewal of our towns and cities.’

‘in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.’

Government response to the local housing need proposals in ‘Changes to the current planning system’

In the emerging local plan, which uses the figure of 922 dwellings per year, it is proposed that over 750 hectares of Green belt be released and allocated for housing. If the figure of 1023 dwellings per year were used, it can only be assumed that pressure on green belt would be even greater. Great import is attached to preserving Greenbelt in the NPPF.

- 1 The Government attaches great importance to Green Belts. 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 their permanence.

NPPF section 133

It is also clear from the NPPF that the release of green belt can only be considered in ‘exceptional circumstances’.

- 1 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

NPPF Section 136

We consider that meeting a housing target which cannot be accurately described as an 'objectively assessed need' does not qualify as an 'exceptional circumstance' in which Green belt may be released.

Furthermore, even where exceptional circumstances apply, green belt may only be released as a last resort.

- 1 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:
 - 2 a) makes as much use as possible of suitable brownfield sites and under utilised land;
 - 3 b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
 - 4 c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

NPPF Section 137

We do not consider that all other options for housing have been appropriately considered in this local plan. For example, the windfall figure which is provided for in this plan is 133.8 per year. In the last fourteen years the windfall figure has been 306.2 per year on average (346 per year over the last five years). The figure for this plan period is therefore far lower than could be reasonably expected. However, permitted development rules have been widened significantly, and now include the potential to increase the height of buildings, adding flats on top of blocks of flats and adding flats on top of shops. This will likely mean that windfall figures will if anything, increase. On top of this, the pandemic is expected to cause a shift away from office space for businesses in favour of more flexible working practices and this is likely to free up more brown field space within towns all over the country, thereby taking pressure off green field and green belt sites.

According to the NPPF:

- 1 Green Belt serves five purposes:
 - 2 a) to check the unrestricted sprawl of large built-up areas;
 - 3 b) to prevent neighbouring towns merging into one another;
 - 4 c) to assist in safeguarding the countryside from encroachment;
 - 5 d) to preserve the setting and special character of historic towns; and
 - 6 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61

There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have asked for it. This need is not being met adequately through this plan. The Local Housing Needs Assessment ('LHNA') for South West Herts estimated that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing. Whilst this figure may also be impacted to a certain extent by the expected decrease in growth which has caused the ONS projections for our area to reduce from 730 to 355 dwellings per year, the current need is still large.

It is our view that the Local Plan does not include sufficient allocations for affordable, or in particular social housing for the needs of Dacorum residents. Of the 922 dwellings proposed per year only 70 per year are expected to be social housing, as compared to the need for 315 social dwellings per year from the LHNA. We would like to see a third of housing delivered in Dacorum be social rented housing. A large proportion of the housing envisioned in this plan will not be affordable for our residents, but is rather aimed at London commuters, and this will do nothing to improve the affordability of housing in Dacorum.

Included files

Title Question: National Policy and Guidance

ID EGS13827

Person ID 1207914

Full Name Maria Oliver

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

QUESTIONS NPPF comment

The need for housing at this level is not justified because it exceeds recommended development by 600 houses a year.

Are brownfield sites being fully exploited? If not then there is no justification to change Green Belt boundaries.

Included files	
Title	Question: National Policy and Guidance
ID	EGS13842
Person ID	777073
Full Name	Mrs Anne Lyne
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	The NPPF allows leeway in the calculation of housing target numbers. The option could have been used in developing the Plan as it is obvious that the targets imposed on the Borough by the Government are double what is reasonable.
Included files	
Title	Question: National Policy and Guidance
ID	EGS13857
Person ID	1270387
Full Name	Mr Richard Pilkinton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	The latest housing needs information is not used. If it were it is unlikely that any building would be required on Green Belt land.

The housing needs are not calculated using the 2018 ONS data and do not take adequate account of Green Belt and AONB constraints. Since the publication of the Plan, the Government has revised it's method of housing needs calculation but still not to use the latest ONS data.

Included files

Title Question: National Policy and Guidance

ID EGS13872

Person ID 611689

Full Name Mrs Sheila Pilkinton

Organisation Details Markyate Parish Council

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment

The latest housing needs information is not used. If it were it is unlikely that any building would be required on Green Belt land.

The housing needs are not calculated using the 2018 ONS data and do not take adequate account of Green Belt and AONB constraints. Since the publication of the Plan, the Government has revised it's method of housing needs calculation but still not to use the latest ONS data.

Included files

Title Question: National Policy and Guidance

ID EGS13882

Person ID 1270388

Full Name Mr & Mrs David & Emma Robertson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p> <p>It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.</p>

Included files	
Title	Question: National Policy and Guidance
ID	EGS13907
Person ID	1264756
Full Name	Kathryn Salway
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<ul style="list-style-type: none"> • Para 11(b) of the NPPF requires ‘objectively assessed needs for housing’. The number of houses should specifically meet Dacorum’s need for the full range of affordable social housing, as defined in my answer to question • The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and • Para 20(c) of the NPPF requires ‘sufficient provision for community facilities (such as health)’ there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the • NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately <p>The proposed wildlife corridors are not explicit or mapped as required by the NPPF.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS13919
Person ID	1207810

Full Name	Louisa Groves
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	Yes. But the National Planning Policy is wrong. They are proposing too many new houses for Dacorum and there is not the need for them.
Included files	
Title	Question: National Policy and Guidance
ID	EGS13929
Person ID	1270392
Full Name	Ms Anna Skingley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b) i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p>

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS13951

Person ID 1145435

Full Name Mr Paul Crosland

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes
* No

**QUESTIONS NPPF
comment**

A. Paragraph 11 of the National Planning Policy Framework states :

“The presumption in favour of sustainable development.

Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- 1 *plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- 2 *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

I have stated elsewhere that I remain unpersuaded on the assumptions made that lead to the number of dwellings proposed to be built in the Dacorum Borough Council area over the period of the Local Plan.

There is an assumption in the Draft Plan that there is demonstrable benefit that outweighs the disbenefits of the proposed release of land from the Green Belt. I dispute that this is the case. In Berkhamsted and Northchurch, sub paragraphs i) and ii) should take precedence and be applied in order to protect the local area.

Comments such as “sustaining vibrancy” etc are not accompanied by evidence to support the argument. Maintaining supply and delivery

Paragraph 73 of the NPPF includes the comment: *“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old”*.

This invites the question on what is the appropriate number of dwellings to satisfy the local housing need: arguably in Dacorum, the need is for dwellings at ‘affordable cost’ or ‘social rent’. The footnote 37 on page 20 of the NPPF states:

“Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance”.

This introduces a contradiction and confuses open market housing *supply* with housing *need*. It leads to a further increase of dwelling numbers, in excess of what the ONS data is projecting, and locally, to significant demand for Green Belt land release beyond the level that the local urban areas have the capacity to accommodate.

The strategic policy adopted in 2013 set an annual requirement of 430 dwellings per annum; the ‘local housing need’ may be greater than this number, but even so that is larger than the number projected from the 2018 ONS data.

B Green Belt – releases

The Draft Local Plan sets out to meet the stated number of dwellings as required or calculated by the ‘standard method’ determined by the Ministry of Housing, Communities and Local Government with a modest buffer.

Paragraphs 19.6 and 19.7 of the Draft Plan make reference to Para 136 of the NPPF viz:
(see attachment)

As a point of order, until the adoption of the Draft Plan, the final sentence should read: “It is *proposed to release* Green Belt land to enable the delivery of the spatial strategy for Dacorum” (my italics)

Paragraph 137 of NPPF states:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- 1 makes as much use as possible of suitable brownfield sites and underutilised land;*
- 2 optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- 3 has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common*

I note that the 2017 consultation identified ‘urban capacity’ as 10,940 dwellings. Experts shall not doubt argue the technical aspects of a) and b) but as I have noted elsewhere, I cannot agree with the statement that “the site locations selected for Berkhamsted (and Northchurch) can be considered as ‘*other locations well served by public transport*’ (sub- paragraph b) above.

Included files	EGS13951.docx
Title	Question: National Policy and Guidance
ID	EGS13971

Person ID	1270381
Full Name	Alexandra Das-Crosland
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>A. Paragraph 11 of the National Planning Policy Framework states :</p> <p>“The presumption in favour of sustainable development.</p> <p><i>Plans and decisions should apply a presumption in favour of sustainable development.</i></p> <p><i>For plan-making this means that:</i></p> <ol style="list-style-type: none"> 1 <i>plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;</i> 2 <i>strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:</i> <ul style="list-style-type: none"> • <i>the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or</i> • <i>any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”</i> <p>I have stated elsewhere that I remain unpersuaded on the assumptions made that lead to the number of dwellings proposed to be built in the Dacorum Borough Council area over the period of the Local Plan.</p> <p>There is an assumption in the Draft Plan that there is demonstrable benefit that outweighs the disbenefits of the proposed release of land from the Green Belt. I dispute that this is the case. In Berkhamsted and Northchurch, sub paragraphs i) and ii) should take precedence and be applied in order to protect the local area.</p> <p>Comments such as “sustaining vibrancy” etc are not accompanied by evidence to support the argument. Maintaining supply and delivery</p> <p>Paragraph 73 of the NPPF includes the comment: “<i>Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing</i></p>

requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old”.

This invites the question on what is the appropriate number of dwellings to satisfy the local housing need: arguably in Dacorum, the need is for dwellings at ‘affordable cost’ or ‘social rent’. The footnote 37 on page 20 of the NPPF states:

“Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance”.

This introduces a contradiction and confuses open market housing *supply* with housing *need*. It leads to a further increase of dwelling numbers, in excess of what the ONS data is projecting, and locally, to significant demand for Green Belt land release beyond the level that the local urban areas have the capacity to accommodate.

The strategic policy adopted in 2013 set an annual requirement of 430 dwellings per annum; the ‘local housing need’ may be greater than this number, but even so that is larger than the number projected from the 2018 ONS data.

B Green Belt – releases

The Draft Local Plan sets out to meet the stated number of dwellings as required or calculated by the ‘standard method’ determined by the Ministry of Housing, Communities and Local Government with a modest buffer.

Paragraphs 19.6 and 19.7 of the Draft Plan make reference to Para 136 of the NPPF viz:

(see attachment)

As a point of order, until the adoption of the Draft Plan, the final sentence should read: “It is *proposed to release* Green Belt land to enable the delivery of the spatial strategy for Dacorum” (my italics)

Paragraph 137 of NPPF states:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- 1 makes as much use as possible of suitable brownfield sites and underutilised land;*
- 2 optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- 3 has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common*

I note that the 2017 consultation identified ‘urban capacity’ as 10,940 dwellings. Experts shall not doubt argue the technical aspects of a) and b) but as I have noted elsewhere, I cannot agree with the statement that “the site locations selected

for Berkhamsted (and Northchurch) can be considered as 'other locations well served by public transport' (sub- paragraph b) above.

Included files

[EGS13951.docx](#)

Title Question: National Policy and Guidance

ID EGS13979

Person ID 1270411

Full Name Ms Jacqui Parr

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment (no comment)

Included files

Title Question: National Policy and Guidance

ID EGS13999

Person ID 1270412

Full Name James Mullins

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment	27) National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.
Included files	
Title	Question: National Policy and Guidance
ID	EGS14006
Person ID	1270423
Full Name	BERNAREGGI GRAZIA
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	Housing targets: The whole plan is based on out of date housing projections from 2014 which are double the latest projections from 2018. This mean that the whole plan is flawed and does not justify any use of green belt land.
Included files	
Title	Question: National Policy and Guidance
ID	EGS14024
Person ID	1270425
Full Name	EMMA LELIEVELD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTIONS NPPF comment	It remains unclear how the proposed developments would meet the various guiding development policies including climate change and sustainability. The reasoning provided is aspirational, unconvincing and lacks a credible and detailed implementation plan. In particular, it remains unclear how and by whom the costs of providing for infrastructure and other investments would be met. These details must be clarified before the moving to the pre-submission stage.
Included files	
Title	Question: National Policy and Guidance
ID	EGS14036
Person ID	1270428
Full Name	KIERAN HOLLAND
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Many original reports are now out dated and will need updating.
Included files	
Title	Question: National Policy and Guidance
ID	EGS14041
Person ID	1270471
Full Name	PHILIP HICKS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No

* Yes	
* No	
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS14060
Person ID	1264962
Full Name	Courtney Culverhouse
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
QUESTIONS NPPF comment	I agree with the assessment of Dacorum Green Party when it comes to this.
Included files	
Title	Question: National Policy and Guidance
ID	EGS14069
Person ID	1270476
Full Name	ALISON CHESHIRE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No

**QUESTIONS NPPF
comment**

There has not been enough consideration of areas of AONB and Green Belt, which are highly valued by local residents as well as visitors from more densely populated areas who enjoy visiting. There has been insufficient account taken of objectively assessed need. It is clear that the plans to release much valued Green Belt land will have a significant adverse affect, which has not been justified by objectively assessed need.

NPPF - S60 — to say it doesn't make sense that the most recent statistics from the Office of National Statistics (ONS) have been disregarded in favour of out-of-date 2014 statistics is an understatement! It's ludicrous. The only reason for doing this is that the government realised that if it used up-to-date statistics, then many local authorities would have to materially change their plans. We would rather do what suits us, than rely on the evidence, even if it means destroying the Green Belt.'

It is irrational and nonsensical to risk the Green Belt on such an ill-conceived policy.

The council should insist that the government uses the most accurate, and therefore up-to date information to calculate the housing target. There is not enough effort made to find brownfield land, especially as it is anticipated that the impact of the pandemic will be to free up a lot of the commercial properties in the brownfield sites.

The proportion of social housing is far too low — there are 7000 people currently on the housing register. These are people who qualify for social housing but cannot get it because of the shortage. The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents.

NPPF Section 137 — Not enough thought has been given to options for housing that is not on the Green Belt. The estimation of windfall development is too low. Evidence of recent years suggests a higher amount (346 per year rather than the 133.8 provided). It is reasonable to project a higher amount of windfall given thar rules on town centre and office developments. The pandemic has led to more flexible working and this is likely to mean businesses move away from urban centres, taking pressure off the Green Belt According to the NPPF: 134. Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134 — Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic. Social housing need in Dacorum Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings. Within this context, the size, type and

tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

NPPF Section 61 — We need the right houses, in the right places for local people. The proposed plan seems more likely to meet the need of developers than the local communities. There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have applied for it. The proposed local plan does not meet this need. The Local Housing Needs Assessment ('LHNA') for South West Herts estimates that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing. The Local Plan does not include sufficient allocations for affordable, or social housing for the needs of Dacorum residents. Only 70 of the 922 dwellings per year are expected to be social housing, compared to the need for 315 social dwellings per year from the LHNA. The developer led housing in this plan is aimed at meeting the demand for London commuter belt housing, rather than the local housing need of our own communities.

Included files	
Title	Question: National Policy and Guidance
ID	EGS14093
Person ID	1261168
Full Name	Pat Whiteman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	The plan is inconsistent with the National Planning Policy Framework (NPPF) in many respects. See submission from 'Tring in Transition'. DBC has failed to demonstrate the exceptional circumstances which the NPPF requires before any Green Belt can be released for development. The Green Belt cannot be reclaimed once it has been lost and should be preserved for future generations.
Included files	
Title	Question: National Policy and Guidance

ID	EGS14118
Person ID	1270501
Full Name	DAVID WHITE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>The Campaign for the Protection of Rural England (CPRE) Hertfordshire's states that Dacorum's Plan is not consistent with the NPPF as it does not take account of such constraints as Green Belt and AONB when calculating housing need.</p> <p>"We do not believe that the Plan is consistent with the NPPF. DBC state that they aim to "minimise" development on Green Belt land and the impact on the Chilterns AONB. We believe that DBC have ignored this aim in order to meet an unnecessary and inflated housing target that they themselves have chosen. The proposed developments in Northchurch are Green Belt and the Darrs Lane site borders the Chilterns Area of Outstanding Natural Beauty."</p> <p>Dacorum "are not obliged by the NPPF to prioritise housing targets over environmental or other concerns: paragraph 11, footnote 6 allows Dacorum to restrict the scale of development due to other planning constraints such as the impact on the Green Belt and AONB. In our view, the failure to do this means that their proposals are not consistent with the NPPF."</p> <p>The 'places vision', emphasises growth over all other considerations and does not reflect the aspirations of local people. Northchurch Parish Council has many formal and informal consultations with residents about what is important to them. In line with their views, our published mission is to make Northchurch "a safe, healthy and vibrant community by:</p> <ul style="list-style-type: none"> • Helping local people to improve their physical health and mental wellbeing • Making our roads safer • Protecting and improving access to the Green Belt and other open spaces • Preserving the environment and increase biodiversity • Preserving the historic identity of Northchurch • Being open and accessible, and engage local people in decision making"

<https://www.northchurchparishcouncil.gov.uk/>

All our work is focussed on achieving these aims. For example, we have a 5-year project to increase biodiversity by changing a 400m stretch of closely mown verge into a wildflower verge. We are carrying out a major project to improve play and exercise facilities at our recreation ground. We have set up a committee dedicated to improving road safety. These efforts will be undermined by the loss of so many acres of Green Belt. By over-emphasising growth, the 'places vision' meets neither the aspirations nor the concerns of Northchurch residents.

Included files

Title Question: National Policy and Guidance

ID EGS14138

Person ID 1263506

Full Name Ian Brown

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and underutilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are

non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS14159

Person ID 1163439

Full Name Lindy Weinreb

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment A I note the statements in the NPPF Para 11:
“The presumption in favour of sustainable development.

Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

I have previously said I remain unpersuaded on the assumptions made that lead to the number of dwellings proposed to be built over the Plan period. There is an assumption in the Draft Plan that there is demonstrable benefit that outweighs the disbenefits of the proposed release of land from the Green Belt. I dispute that this is the case certainly around Berkhamsted and Northchurch where sub para i and ii should take precedence and be applied.

Comments such as sustaining vibrancy etc are not accompanied by evidence to support the argument.

B Maintaining supply and delivery

Para 73 includes the comment: Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

This invites the question on what is the appropriate number for the local housing need: in this Borough the need is for dwellings at 'affordable cost' or 'social rent'. The footnote 37 [Page 20] states:

Where local housing need is used as the basis for assessing whether a five-year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.

This introduces a contradiction and conflates open market housing supply with housing need. This leads to a further increase of dwelling numbers, in excess of what the ONS data is projecting, and locally, to significant demand for Green Belt land release beyond the urban capacity.

The strategic policy adopted in 2013 sets an annual requirement of 430 dpa; the 'local housing need' may be greater than this number, but even so that is larger than the number projected from the 2018 ONS data.

C Green Belt – releases

The Draft Plan sets out to meet the stated number of dwellings as required or calculated by the 'standard method' determined by the Ministry, with a modest buffer. Para 19.6 and 19.7 of the Draft Plan make reference to Para 136 of the NPPF viz:

Until the adoption of the Draft Plan, the final sentence should read:

It is proposed to release Green Belt land to enable the delivery of the spatial strategy for Dacorum.

First Dacorum has to 'prove beyond doubt' that "exceptional circumstances" exist to allow the release of Green Belt, which Berkhamsted Citizens remain vehemently opposed to.

F Para 137 says:

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

I note the 2017 consultation identified Urban Capacity as 10,940 dwellings. I shall leave it to others to determine the technical aspects of a) and b) but I cannot agree that the site locations selected for Berkhamsted [and Northchurch] can be considered as 'other locations well served by public transport'.

I look forward per sub para c) to learning whether discussions with neighbouring authorities prove fruitful.

Attachment A ref Question 2 & 3

Included files

Title Question: National Policy and Guidance

ID EGS14177

Person ID 1270552

Full Name Mr Michael Friend

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment (no comment)

Included files

Title Question: National Policy and Guidance

ID	EGS14196
Person ID	1253654
Full Name	Jodie Bell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine <input type="checkbox"/>all other reasonable options for meeting its identified need for development<input type="checkbox"/> before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy <input type="checkbox"/>optimises a density of development in- line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport<input type="checkbox"/>. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

Included files

Title Question: National Policy and Guidance

ID EGS14224

Person ID 1270581

Full Name MR & MRS DUNCAN

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS14264

Person ID 1152075

Full Name Rob Wakely

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* **Yes**

* **No**

QUESTIONS NPPF comment

- Para 11(b) of the NPPF requires 'objectively assessed needs for housing'. The number of houses should specifically meet Dacorum's need for the full range of affordable social housing, as defined in my answer to question
- The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and
- Para 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been no assessment of the impact on capacity of

existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap.

- NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately

The proposed wildlife corridors are not explicit or mapped as required by the NPPF.

Included files

Title Question: National Policy and Guidance

ID EGS14289

Person ID 1270629

Full Name Rob Bray

Organisation Details Head of Sponsorship & Fundraising
Tring Rugby Club

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTIONS NPPF comment (27) National Policy and Guidance – Plan isn't consistent with NPPF because it doesn't offer the protection for Green Belt that the NPPF demands and prioritises Green Belt development over brownfield/urban development.

Included files

Title Question: National Policy and Guidance

ID EGS14298

Person ID 1270631

Full Name SIMON LEGG

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	You seem to have ignores that Northchurch is in an area of AONB and Green Belt, which are highly valued by residents, attracting numerous visitors on the Ashbrige estate.
Included files	
Title	Question: National Policy and Guidance
ID	EGS14309
Person ID	1259141
Full Name	Kirsten Riemer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether</p>

minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b). Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance. It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS14336
Person ID	1270635
Full Name	Catherine Bright
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield</p>

redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

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Included files	
Title	Question: National Policy and Guidance
ID	EGS14361
Person ID	1270641
Full Name	WILLIAM ALLEN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	

**QUESTIONS NPPF
comment**

Insufficient consideration has been given to policies which protect assets such as green belt and AoNB. This is not based on the NPPF's requirement that the Local Plan is based on objectively assessed need. Section 60 of the NPPF requires housing need to be based on a local housing need assessment which then sets a housing level through the standard method. However, the standard method is based on flawed and redundant data (2014 ONS data) rather than more recent 2018 ONS data. More recent evidence of population changes brought about by Covid and Brexit are also ignored. So, the release of Green Belt is not evidenced to be required by exceptional circumstances, as required by NPPF section 133 and 136.

There is insufficient evidence that the Local Plan meets Section 137 which states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- 1 makes as much use as possible of suitable brownfield sites and under utilised land;
- 2 optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- 1 has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

NPPF Section 61 requires "the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies", yet there is insufficient evidence that the housing proposed in the Local Plan meets the needs of the 7000 people who meet the criteria for council or housing authority housing and who have asked for it. The Local Housing Needs Assessment (LHNA) for South West Herts estimated that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing. The Local Plan does not meet these needs.

The Local Plan does not include sufficient allocations for affordable, or in particular social housing for the needs of Dacorum residents. Of the 922 dwellings proposed per year only 70 per year are expected to be social housing, as compared to the need for 315 social dwellings per year from the LHNA. We would like to see a third of housing delivered in Dacorum be social rented housing. A large proportion of the housing envisioned in this plan will not be affordable for our residents, but is rather aimed at London commuters, and this will do nothing to improve the affordability of housing in Dacorum.

Included files

Title

Question: National Policy and Guidance

ID	EGS14384
Person ID	1270640
Full Name	Geoffrey Llewellyn
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	It concentrates development in the South East where there is already too much housing, traffic and concentration of population with the resulting problems of water resources, and infrastructure deficiencies as I have previously stated. The pressing national requirement is for levelling up. DCB's plans do just the opposite. There should be greater housing density in other parts of the country to encourage the movement of populations to more peripheral areas resulting in their regeneration.
Included files	
Title	Question: National Policy and Guidance
ID	EGS14399
Person ID	869011
Full Name	Mr John Savage
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	

Title	Question: National Policy and Guidance
ID	EGS14409
Person ID	1270653
Full Name	NEIL BRANCH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	failure to fully consider Strategic policies Point 20c NPPF...sufficient provision for community facilities . There seems to be little consideration of the impact on the capacity of the primary care provision
Included files	

Title	Question: National Policy and Guidance
ID	EGS14425
Person ID	1270662
Full Name	MAX GOODE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	LCR and NR generally agree that the emerging Local Plan subject to the comments raised as part of these formal Representations is consistent with the National Planning Policy Framework and supporting guidance.
Included files	

Title	Question: National Policy and Guidance
ID	EGS14442
Person ID	1270665
Full Name	Cllr Stephen Claughton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Due consideration has not been given to policies which protect assets such as the Green Belt and Chilterns AONB. Nor does the Plan provide housing which meets the area's objectively assessed need. The nationally-imposed target does not provide justification for releasing Green Belt land, which may be done only in "exceptional circumstances" and as a last resort.
Included files	
Title	Question: National Policy and Guidance
ID	EGS14459
Person ID	1265051
Full Name	Edmund Knox
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine // all other reasonable options for meeting its identified need for development // before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy // optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

- significant uplift in minimum density standards in town and city centres and other locations well served by public transport 11 There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan 's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title

Question: National Policy and Guidance

ID	EGS14508
Person ID	1270685
Full Name	Ms Jan Kerry
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p>

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

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Included files

Title Question: National Policy and Guidance

ID EGS14518

Person ID 1270383

Full Name Mr Nigel Kerry

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield

sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

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significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

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Included files

Title Question: National Policy and Guidance

ID EGS14534

Person ID 1270690

Full Name Akzo Nobel CIF Nominees Ltd

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No	
QUESTIONS NPPF comment	Our client considers the draft Local Plan to be broadly consistent with the NPPF and supporting guidance. We urge the Council to ensure the next iteration of the Local Plan is as robust as possible to ensure it satisfies all of the soundness tests (positively prepared, justified, effective and consistent with national policy) in accordance with paragraph 35 of the NPPF. It is acknowledged that the next iteration of the Local Plan made need to reflect the Government's latest NPPF and National Model Design Code: consultation proposals which is currently live.
Included files	
Title	Question: National Policy and Guidance
ID	EGS14544
Person ID	1163978
Full Name	John Wignall
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development " before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield</p>

sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport ". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

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Included files

Title Question: National Policy and Guidance

ID EGS14575

Person ID 1270700

Full Name Mr Peter Sims

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No	
QUESTIONS NPPF comment	No Comment, as NPPF is also flawed as it hasn't been revised in line with changes needed to for country to meet it's legally binding Zero Carbon Target.
Included files	
Title	Question: National Policy and Guidance
ID	EGS14580
Person ID	1270702
Full Name	TESCO PENSION INVESTMENT FUND MANAG
Organisation Details	C/O Savills
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS14632
Person ID	1270729
Full Name	MR & MRS A HOUGHTON
Organisation Details	
Agent ID	1270728
Agent Full Name	MS KAREN GALLEY
Agent Organisation	
Yes / No	No

* Yes	
* No	
QUESTIONS NPPF comment	<p>The National Planning Policy Framework states there is a requirement to demonstrate the plan utilises suitable brownfield and under-utilized land as far as possible – has this been exhausted for all areas outside of Hemel Hempstead, and in the light of the impact of the pandemic and associated changes?</p> <p>Also, reference is made to the optimization of the density of development and the promotion of a significant uplift in minimum density standards for locations served well by public transport, and is there further work to do for Berkhamsted and Tring?</p> <p>What has been the proactive cooperation with surrounding local planning authorities Hertfordshire, Bedfordshire and Buckinghamshire to justify the exceptional circumstances position for use of Green Belt?</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS14642
Person ID	1270731
Full Name	MRS JOAN EELEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	No
* Yes	
* No	
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that</p>

nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

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It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS14652
Person ID	1265051
Full Name	Edmund Knox
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine // all other reasonable options for meeting its identified need for development // before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy // optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a</p> <ul style="list-style-type: none"> • significant uplift in minimum density standards in town and city centres and other locations well served by public transport <p>11 There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p>

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan 's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS14670

Person ID 860814

Full Name Mrs Clare Joyce

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment Insufficient time to review

Included files

Title Question: National Policy and Guidance

ID EGS14686

Person ID 1270739

Full Name HELEN OSBORNE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

No

**QUESTIONS NPPF
comment**

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

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With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport" . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

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Included files

Title Question: National Policy and Guidance

ID EGS14696

Person ID 1270740

Full Name	JOHN OSBORNE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport" . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p>

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Included files

Title Question: National Policy and Guidance

ID EGS14708

Person ID 1270752

Full Name DOUGLAS CANNON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

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Included files

Title Question: National Policy and Guidance

ID EGS14720

Person ID 1270753

Full Name ANNE PIKE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

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Included files	
Title	Question: National Policy and Guidance
ID	EGS14790
Person ID	1142710

Full Name	Mr Chris Stoneman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “ all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Gramework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport.” There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).</p> <p>, Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.</p> <p>It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively</p>

, assessed need. Therefore, the Plan ' s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS14801

Person ID 1270798

Full Name SAYED BEL-BAROO

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt. The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

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Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

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Included files

Title Question: National Policy and Guidance

ID EGS14815

Person ID 1270802

Full Name Mr Edward Blogg

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTIONS NPPF comment

Whilst accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, I have serious concerns regarding the sheer scale of proposed development.

The Council has failed to take account of National Planning Policy Framework (NPPF), paragraph 11, footnote 6 which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.

I also acknowledge that recent Government guidance on calculating housing need has been, at best, confusing. I strongly believe that housing needs should be based on the most recent and relevant data, which is currently the 2018 based Office for National Statistics (ONS) projections. The Council has based its calculations on the outdated 2014 based ONS

data which, in my opinion, would result in a significant overestimate of housing and brings into question the soundness of any local plan based on them.

Included files

Title Question: National Policy and Guidance

ID EGS14830

Person ID 1270804

Full Name Dr Jessica Field

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

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minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

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Included files	
Title	Question: National Policy and Guidance
ID	EGS14847
Person ID	325470
Full Name	Gardener Family Trust
Organisation Details	Gardener Family Trust
Agent ID	1270807
Agent Full Name	Mr Alistair Brodie
Agent Organisation	Henry H Bletsoe & Son LLP
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS14848

Person ID	1270808
Full Name	Westmorland Limited
Organisation Details	Westmorland Ltd
Agent ID	1270759
Agent Full Name	Miss Hanna Mawson
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	<ul style="list-style-type: none"> • Along with national policy as set out in the NPPF (referenced above) the Strategy Document also makes reference to the recent Planning White Paper. The document identifies some steps have been included to reflect some of the proposals including: <ul style="list-style-type: none"> • Introducing the simplified zoning categories; and • Strengthening local design policies and guidance <p>There has been no further detail following the Planning White Paper consultation and, at present, the approach reflecting certain aspects of this (as set out above) is appropriate and is supported.</p> <p>In terms of national policy on truckstops, the NPPF is clear that <i>“Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking locations that lack proper facilities or could cause a nuisance (paragraph 107)”</i>.</p> <p>The provision of truckstops is also addressed by the Department of Transport Circular 02/13 The Strategic Road Network and the Delivery of Sustainable Development which sets out the national policy context for roadside facilities. It is clear that the primary function of roadside facilities is to support the safety and welfare of the road user, which maintains the effectiveness and efficiency of the strategic road. Truckstops provide an important road safety function and allow HGV drivers to take statutory breaks. The Circular also specifies the mandatory parking provision for different types of roadside facilities, including truckstops. This is discussed further at Section 6.</p> <p>The Hertfordshire Local Transport Plan also recognises the need to manage freight and logistics (Policy 16) which includes support for improvements in HGV provision in the county, including overnight parking, in appropriate locations.</p> <p>In addition to the policy context, there is further evidence prepared by both Highways England and Hertfordshire County Council, important statutory partners responsible for the delivery of provision of infrastructure for freight, which plays a vital role in the UK economy.</p> <p>As set out within the Vision Document in Appendix 1, The Department for Transport has attempted to increase lorry parking facilities for some time. They published a National Survey for Lorry Parking in 2017, which identified the East of</p>

England (in which Dacorum is located) as one of the most critical regions in need of additional HGV parking with the majority of truckstops full and at capacity, including Watling Street Truckstop.

Hertfordshire County Council in conjunction with Hertfordshire Local Enterprise Partnership (LEP) has also sought to overcome issues relating to HGV parking issues arising at the Maylands Business Park. They commissioned AECOM to identify transport infrastructure needs. This report identified that there are HGV parking issues, including parking on local roads, with no facilities, causing disruption to traffic. It is understood, anecdotally, that policing the parking of HGVs is difficult as there is no alternative parking solution for the vehicles at present. The report goes on to say that Watling Street Truckstop is very busy and at certain times is full. Given the close proximity of the truckstop to Maylands, one of the key recommendations (A2) of the report is to consider the expansion of Watling Street Truckstop.

As highlighted above, the national and local policy context and evidence acknowledges the shortfall within the vicinity and, hence, land use policies proactively driving proposals for HGV parking are supported as further set out in these representations.

Included files

Title Question: National Policy and Guidance

ID EGS14865

Person ID 1265016

Full Name Charles Aylwin

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment (no comment)

Included files

Title Question: National Policy and Guidance

ID EGS14875

Person ID 1270825

Full Name Mr Richard Hardy

Organisation Details	Managing Director Lansdown
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Sequentially the land south of Chaulden Lane would have lesser impact on the Green Belt than other sites included in the Plan. The site is also demonstrably more sustainable than alternatives. The plan should therefore be modified to include this site.
Included files	
Title	Question: National Policy and Guidance
ID	EGS14903
Person ID	1144629
Full Name	Mrs SOPHIE LAWRANCE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	As noted in Section 1 above, the Plan appears to place housing need above almost all other considerations. That is a misreading of paragraph 11 of the NPPF, which requires objectively assessed housing need to be met " <i>unless the application of policies in [the NPPF] that protect areas or assets of particular importance provides a strong reason for restriction the overall scale, type or distribution of development in the plan area; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole</i> ".

The other policies of the NPPF do in fact outweigh the housing need requirements. The Plan appears to conflict with at least to the following policies of the NPPF:

- Paragraph 102, which requires the Council to ensure "*appropriate opportunities to promote sustainable transport modes*"; in planning dormitory sites around the outskirts of towns, the Plan does not comply with this
- Paragraph 103, which requires "*significant development [to] be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*" (See also paragraph 104 requiring assessment of "*the environmental impacts of traffic and transport infrastructure*".)

Paragraph 136, requiring amendment to Green Belt only in "*exceptional circumstances*"; in planning extensive building on areas of Green Belt which have been found by independent consultants to fulfil the Green Belt purposes (NPPF, paragraph 134), such exceptional circumstances are not demonstrated.

- Paragraph 148, requiring planners to "*support the transition to a low carbon future in a changing climate*" and to "*shape places in ways that contribute to radical reductions in greenhouse gas emissions*": in planning dormitory sites around the outskirts of towns, the Plan does not comply with this requirement.
- Paragraph 172, which requires "*great weight*" to be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty: in planning sites which are recognised to impact on the Ashridge AONB due to their visibility from the site, the Plan does not comply with this requirement.
- Paragraph 174, which requires the Council to "*promote the conservation, restoration and enhancement of priority habitats*" and paragraph 175(c), which requires the Council to avoid "*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons*"; these policies are put in jeopardy by the proposed development of areas involving mature trees, ancient hedgerows and natural habitats.
-

Given the changes resulting from the pandemic, as well as from population changes post Brexit, the injunction in paragraph 11 of the NPPF that plans should "*be sufficiently flexible to adapt to rapid change*" also appears paramount. There is little evidence of any real flexibility in the Plan if it is adopted.

Included files	
Title	Question: National Policy and Guidance
ID	EGS14910
Person ID	1270828
Full Name	Owen Ellander
Organisation Details	Head of Property Development Greene King Brewing and Retailing Ltd

Agent ID	1270829
Agent Full Name	Mrs Helen Binns
Agent Organisation	Walsingham Planning
Yes / No * Yes * No	No
QUESTIONS NPPF comment	Land is included within the Green Belt that does not satisfy the purposes for including land within the Green Belt - see letter of representation from Walsingham Planning
Included files	
Title	Question: National Policy and Guidance
ID	EGS14938
Person ID	1270839
Full Name	EMMA WELLER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield</p>

redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

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Included files

Title Question: National Policy and Guidance

ID EGS15008

Person ID 869019

Full Name Mrs Shelley Savage

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS15011
Person ID	1270845
Full Name	DOMINIC LAWRANCE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	There are grave and fundamental problems with the proposed plan. Inter alia, these result from an apparent misunderstanding by DBC of its obligations, under the NPPF to satisfy housing need. DBC seems to have concluded that meeting housing need is a paramount obligation, which trumps all other considerations and obligations under planning law. This is simply not the case. This misunderstanding has profound implications for the soundness of policy SP2, and the proposed local plan as a whole.
Included files	
Title	Question: National Policy and Guidance
ID	EGS15027
Person ID	1270845
Full Name	DOMINIC LAWRANCE
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>It should be clear from the above that there are serious inconsistencies with / breaches of the NPPF in the proposed plan. In particular, the plan is inconsistent with:</p> <ul style="list-style-type: none"> • The policy regarding the Green Belt, contained in chapter 13 of the NPPF, which provides that “<i>Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified</i>” (paragraph 136). It is very doubtful whether mere housing need can amount to exceptional circumstances for these purposes. Moreover, there must be substantial doubt about the validity of the housing need figure which has been used, not least because of recent and dramatic population changes that pre-date the ONS statistics used as the basis for determining housing need. • The policy regarding Areas of Outstanding Natural Beauty, contained in chapter 15 of the NPPF, which provides that “<i>great weight should be given to conserving and enhancing landscape and scenic beauty in ... Areas of Outstanding Natural Beauty, which have the highest status of protection</i>” (paragraph 172). Many of the development proposals would have a serious adverse impact on the Chilterns AONB. • The policy regarding habitats and biodiversity, also contained in chapter 15 of the NPPF, which provides that “<i>development resulting in the loss or deterioration of irreplaceable habitats ... should be refused, unless there are wholly exceptional reasons</i>” (paragraph 175(c)). Inter alia, the proposed housebuilding programme would result in additional abstraction of water from local chalk aquifers – on which the borough’s chalk streams, a rare and vulnerable natural habitat, are dependent. The plan indicates an intention to manage this issue but the required detail on how this will be achieved is missing.
Included files	
Title	Question: National Policy and Guidance
ID	EGS15050
Person ID	1250021
Full Name	Hallam Land Management Ltd
Organisation Details	Hallam Land Management Ltd
Agent ID	1265070

Agent Full Name	Stacey Rawlings
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The spatial strategy does not accord with the settlement hierarchy. There is an overreliance on the Urban sites (to deliver 73% of the total housing to 2038) and an overly aspirational rate of delivery from them. This is a high-risk strategy, and contrary to national policy that requires new housing to be made available for affordable home ownership to meet identified needs (NPPF 64 and 65). A strategy for Hemel Hempstead town that relies disproportionately upon the delivery of brownfield land to 2038 runs the risk of not meeting identified housing needs in a sustainable way.</p> <p>It is also evident that the distribution of the main strategic greenfield allocations does not reflect the Council's settlement hierarchy. Phase 1 of HGC is the only new greenfield allocation (1500 dwellings within the plan period) with the major greenfield growth at Berkhamstead and Tring (tier 2 settlements) capable of delivering at least 1,730 and 2,274 units respectively within the plan period. This runs the risk of a significantly low proportion of affordable homes being delivered at the most sustainable settlement.</p> <p>Tested against NPPF 139, the proposed safeguarding of land from the Green Belt to meet longer- term development needs beyond the plan period is noted. The first half of the draft plan appears to follow that approach. However, the second part, namely the site-specific proposals and the delivery strategy for HGC seeks to allocate the safeguarded land for development of 4,000 homes under Site HH02 in Policy SP15. The Housing Topic Paper suggests this is necessary to assist with the Councils Infrastructure finding bids from Central Government [Footnote 3 Para 7.37 and 7.38 of the DBC Housing Policy Topic Paper, November 2020]. NPPF 139 (d) makes it clear that safeguarded land should not be allocated until it is required and should then be considered for allocation in a future plan period. The draft Plan conflicts with the NPPF.</p> <p>The Plan includes development within the AONB which is recognised in NPPF 172 as having the 'highest status of protection'. The evidence concludes that there are sufficient sites outside of the AONB that could come forward (as recognised through the SA process) such that it may not be necessary to allocate growth in the AONB to meet future needs. Further justification is required to set aside this policy constraint and allocate major growth in the AONB in favour of sites in equal or potentially more sustainable locations.</p> <p>Generally, the need to release Green Belt land (a planning, not a landscape constraint) has been justified and the NPPF is met in this regard.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS15109

Person ID	1270925
Full Name	Mrs Kathryn Salway
Organisation Details	Extinction Rebellion Dacorum
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>- Para 11(b) of the NPPF requires 'objectively assessed needs for housing'. The number of houses should specifically meet Dacorum's need for the full range of affordable social housing, as defined in our answer to question 1.</p> <p>- The plan has failed to take account of Para 11, footnote 6 of the NPPF which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.</p> <ul style="list-style-type: none"> • Para 20(c) of the NPPF requires 'sufficient provision for community facilities (such as health)' there appears to have been no assessment of the impact on capacity of existing primary care provision, nor time-scaled provision for additional primary healthcare facilities to bridge the gap. • NPPF requires development on Green Belt land achieves net environmental gain and is mitigated by compensating development of surrounding natural spaces, there is no evidence that this has been adequately considered. <p>The proposed wildlife corridors are not explicit or mapped as required by the NPPF.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS15140
Person ID	1270940
Full Name	
Organisation Details	CERDA PLANNING (ON BEHALF OF BOVINGDON PARISH COUNCIL)
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	It is considered that the Emerging LP is consistent with the guidance in the NPPF where indicated as appropriate in these representations.
Included files	
Title	Question: National Policy and Guidance
ID	EGS15161
Person ID	1270945
Full Name	
Organisation Details	NORTHCHURCH PARISH COUNCIL
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>The Campaign for the Protection of Rural England (CPRE) Hertfordshire states that Dacorum’s Plan is not consistent with the NPPF as it does not take account of such constraints as Green Belt and AONB when calculating housing need. “We do not believe that the Plan is consistent with the NPPF. DBC state that they aim to “minimise” development on Green Belt land and the impact on the Chilterns AONB. We believe that DBC have ignored this aim in order to meet an unnecessary and inflated housing target that they themselves have chosen. The proposed developments in Northchurch are Green Belt and the Darrs Lane site borders the Chilterns Area of Outstanding Natural Beauty.”</p> <p>Dacorum “are not obliged by the NPPF to prioritise housing targets over environmental or other concerns: paragraph 11, footnote 6 allows Dacorum to restrict the scale of development due to other planning constraints such as the impact on the Green Belt and AONB. In our view, the failure to do this means that their proposals are not consistent with the NPPF.”</p>

The 'places vision', emphasises growth over all other considerations and does not reflect the aspirations of local people. Northchurch Parish Council has many formal and informal consultations with residents about what is important to them. In line with their views, our published mission is to make Northchurch "a safe, healthy and vibrant community by:

- Helping local people to improve their physical health and mental wellbeing
- Making our roads safer
- Protecting and improving access to the Green Belt and other open spaces
- Preserving the environment and increase biodiversity
- Preserving the historic identity of Northchurch
- Being open and accessible, and engage local people in decision making"

<https://www.northchurchparishcouncil.gov.uk/>

All our work is focussed on achieving these aims. For example, we have a 5-year project to increase biodiversity by changing a 400m stretch of closely mown verge into a wildflower verge. We are carrying out a major project to improve play and exercise facilities at our recreation ground. We have set up a committee dedicated to improving road safety. These efforts will be undermined by the loss of so many acres of Green Belt. By over-emphasising growth, the 'places vision' meets neither the aspirations nor the concerns of Northchurch residents.

Included files	
Title	Question: National Policy and Guidance
ID	EGS15178
Person ID	1270993
Full Name	MRS MERRIL TRUEMAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	The council has failed to justify the dr ft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport ". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan ' s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS15188

Person ID	1270998
Full Name	PAUL HARRIS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development " before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport " . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and</p>

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan 's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS15199

Person ID 1142578

Full Name Mr Norman Brooks

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine “all other reasonable options for meeting its identified need for development” before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy “optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”. There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan’s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS15221

Person ID 1264623

Full Name Judy Chausalet

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	NPPF requires exceptional circumstances for building on the Green Belt – <i>this requirement has not been fully evidenced or justified in the Local Plan</i> . Nor has the council made use of footnote 6, paragraph 11 which enables housing numbers to be reduced where there would be a detrimental impact on the Green Belt and/or AONB.
Included files	
Title	Question: National Policy and Guidance
ID	EGS15222
Person ID	1271003
Full Name	Thierry Chaussalet
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	NPPF requires exceptional circumstances for building on the Green Belt – <i>this requirement has not been fully evidenced or justified in the Local Plan</i> . Nor has the council made use of footnote 6, paragraph 11 which enables housing numbers to be reduced where there would be a detrimental impact on the Green Belt and/or AONB.
Included files	
Title	Question: National Policy and Guidance
ID	EGS15228
Person ID	1271006
Full Name	Ms Zoe Wiggins
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	(no comment)
Included files	
Title	Question: National Policy and Guidance
ID	EGS15271
Person ID	1271103
Full Name	GRAHAM RITCHIE
Organisation Details	FAIRFAX STRATEGIC LAND (HEMEL) LTD
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	<p>We refer to the above consultation exercise and respond on behalf of our client, Fairfax Strategic Land (Hemel) Ltd, setting out a number of representations upon the Dacorum Local Plan Emerging Strategy for Growth (2020 – 2038) Consultation (the Emerging Strategy), including in relation to the omission of land located west of Piccotts End, Hemel Hempstead (LPA Site Assessment Ref HH69) as a housing allocation for up to 400 dwellings in helping to meet identified housing needs during the plan period.</p> <p>The following plans and documents are submitted in support of our representations:</p>

- Site Location Plan 1920-PL01 Rev A
- Indicative Site Layout 2037-PL04 Rev.G
- Landscape Assessment (Hyland Edgar Driver) (Feb 2021)
- Green Belt Assessment (CSA Environmental) (Feb 2021); and
- Highways and Accessibility Technical Note: Suitability of Land west of Leighton Buzzard Road, Hemel Hempstead and Analysis of Draft Housing Allocations (SK Transport) (Feb 2021).

The content of the supporting plans and particulars is set out below where relevant to the particular issue/discipline being addressed.

Land located to the west of Piccotts End, Hemel Hempstead is controlled by Fairfax Strategic Land (Hemel) Ltd extends to approximately 26ha (Site Assessment Ref HH69) and could provide for up to 400 dwellings.

The land comprises an available, suitable and deliverable opportunity to accommodate housing needs (both market and affordable), in a sustainable location, within the industry standard recommended walking and cycling distances from local services and facilities, including the significant retail, employment, community facility and leisure offer available in the town centre.

In addition, the ability to extend existing bus services into the site further serves to underpin the site's excellent sustainability credentials.

Development of the site for housing provides the opportunity to create a new planned expansion to Hemel Hempstead, and will include a CIL payment and/or commuted sum to be secured through a site-specific planning obligation to enhance the overall offer at Rossgate local centre; thus benefiting the wider community with an enhanced social offer.

The site's proximity to existing local centre, other local facilities as well as Hemel Hempstead town centre demonstrates the sustainability merits of the site for housing when set against the Council's on-going housing need.

A bus stop and turning loop has also been incorporated into the Indicative Site Layout, the provision of which has support from an established local bus provider having and they have confirmed they are willing to use the loop should permission be granted.

Notwithstanding the location of the site within the Green Belt, the character of the site is heavily influenced by the suburbs of Gadebridge, Piccotts End and other surrounding development including the electricity sub-station and garden centre beyond to the north.

The site offers the opportunity to provide a material contribution to the Borough's pressing and on-going housing need and do so in an appropriate manner without impacting upon the wider countryside surrounding Hemel Hempstead. As explained later in these representations, the site is ideally located to be brought forward for development in the early stages of the plan period, and/or in helping to meet a shortfall in the five year supply of deliverable land.

The land has inherent sustainability merits which make it suitable for residential development, and in our view represents a development opportunity providing a logical rounding off to the north of Hemel Hempstead with limit impact upon both the landscape and Green Belt purposes.

For the reasons set out in our submissions there are a number of fundamental shortcomings with the approach to site selection in the Emerging Local Plan Strategy that result in the need for amendments if it is to satisfy the tests of soundness at paragraph 35 of the NPPF.

Based on our assessment of the evidence base that has been used by the Council to underpin the approach to site selection, the Emerging Strategy cannot be said to be justified in so far as it fails to represent an appropriate strategy and nor does it adequately take account of the reasonable alternatives.

This is particularly the case for the approach to site selection at Hemel Hempstead.

We have undertaken a comparative analysis of the draft allocations proposed by the Council, including the 3 no. draft site allocations at Hemel Hempstead, comprising HH-h1b – North of Hemel Hempstead (phase 1), HH-h1b – North of

Hemel Hempstead (phases 1 and 2) and HH-h2 – North of Gadebridge (Land at Piccotts End) and conclude that on a proper consideration of the evidence base the Emerging Strategy should have identified our client's land at Piccotts End as a housing allocation(s).

Our representations focus on specific parts of the Emerging Strategy as follows:

- **Policy SP4: Delivering the Housing Strategy**

The consultation draft Local Plan sets out a need to plan for a significant level of growth, including in the form of urban extensions and Green Belt releases. This includes a significant amount of planned growth at Hemel Hempstead. The spatial strategy has purportedly been informed by a number of evidence base documents. They include, but are not limited to:

- Housing Topic Paper
- Site Selection Topic Paper
- Site Assessment
- Sustainability Appraisal
- Green Belt Study
- Highway Studies

Our detailed representations are set out below and include submissions in response to the content of these evidence base documents, including, inter alia, the Site Assessment (prepared by AECOM alongside the Topic Paper) and the Sustainability Appraisal ("SA").

The NPPF sets out the principal components to be included in local plans. Paragraph 35 requires that in order to be "sound" a Development Plan Document ('DPD') should be positively prepared, justified, effective and consistent with national policy.

In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.

For the reasons set out below, we are of the view that the evidence base fails to provide a reasoned approach to site selection. This includes for the reasons set out in the accompanying plans and particulars (at (i) to (v) above). In this regard, we place particular emphasis upon the comparative analyses undertaken by Hyland Edgar Driver (landscape impact) and SK Transport Planning (highways) in relation to the Council's approach to site selection.

The findings of the CSA Green Belt Assessment are also important in so far as they identify the Council's Green Belt appraisal failed to undertake a finer grain analysis of the site as an individual land parcel. Rather, the Council's analysis assessed the site as part of a much wider area of land. Had the Council undertaken this finer grain analysis they would have concluded in relation to the suitability of the site as a Green Belt release and carried it forward for further assessment as a housing allocation.

As such, it is our view that **the Emerging Strategy cannot be said to be justified and nor can it be said to be effective.** We expand upon our submissions in the detailed considerations as set out below.

Included files	
Title	Question: National Policy and Guidance
ID	EGS15301
Person ID	1161497
Full Name	Mr Robert Sellwood
Organisation Details	The Crown Estate
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTIONS NPPF comment	The Reg 18 Local Plan is generally consistent with the NPPF. The Crown Estate welcomes, in particular, the manner in which the emerging Local Plan deals with Green Belt issues. It has reflected the advice in paragraphs 133 to 147 of the NPPF in seeking to set clear, defensible and long term Green Belt boundaries which will meet development needs beyond

the 2038 end date of the Plan. This will provide the local community and developers with clarity and certainty in the long term.

Included files

Title Question: National Policy and Guidance

ID EGS15350

Person ID 1271220

Full Name MAUREEN RUMSEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTIONS NPPF comment

The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development " before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport ". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Barkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.
1

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan 's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS15358
Person ID	1145662
Full Name	Mrs Catherine Anderson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTIONS NPPF comment	The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.

The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development " before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a

significant uplift in minimum density standards in town and city centres and other locations well served by public transport ". There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan ' s expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS15387
Person ID	1248890

Full Name	Mr Stuart Oldroyd
Organisation Details	Whiteacre Ltd
Agent ID	1270853
Agent Full Name	Jon Goodall
Agent Organisation	DLP Planning Limited
Yes / No * Yes * No	
QUESTIONS NPPF comment	For the purposes of the examination and benefiting the future stages of consultation we have addressed specific references to national policy and guidance within our representations within the relevant chapters of the document.
Included files	
Title	Question: National Policy and Guidance
ID	EGS15400
Person ID	1271257
Full Name	Mr Alastair Hogben
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine " all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield</p>

redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemet Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport " . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify _such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The Council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS15414

Person ID 1259631

Full Name Fay Copestake

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment	This plan has not justified the building of 5,945 dwellings and buildings within the green belt areas. I feel that there has been very little attention paid to detail regarding planning, assessments, quality of services, brownfield areas and communication with other local planning authorities. Paragraph 11 part b Paragraph 137.
Included files	
Title	Question: National Policy and Guidance
ID	EGS15440
Person ID	1271088
Full Name	MIKE WALTERS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine "all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p> <p>With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring. A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.</p> <p>With regard Part b) there is an expectation that the strategy "optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a</p>

significant uplift in minimum density standards in town and city centres and other locations well served by public transport" . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning

Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and

Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt

has not been justified.

Included files

Title Question: National Policy and Guidance

ID EGS15445

Person ID 350823

Full Name Mrs Sue Yeomans

Organisation Details Chairman
Chilterns Countryside Group

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment GREEN BELT

- 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

In Dacorum, some 60% of the Borough is in Green Belt, with further landscape as part of the Chilterns Area of Outstanding Natural Beauty (AONB). The CCG recognises this therefore imposes not only constraints on DBC, but also statutory obligations.

The CCG regrettably finds that the LP is completely imbalanced in its twin objectives of meeting

(a) perceived (but not demonstrated or obligatory) housing demand, rather than need and (b) protecting natural green spaces. It is regretted that DBC has prioritised development at the expense of sacrificing irreplaceable green, natural landscapes of prime importance to the Borough and its present and future residents.

The CCG remains gravely concerned that instead of valuing and protecting the Borough's prime asset of Green Belt, the LP seeks to challenge and irrevocably change Green Belt status and importantly, thus damage the setting of the Chilterns AONB.

- 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 '*
- Clearly, the Green Belt in the Borough, particularly that around Tring and Berkhamsted, currently fulfils those The CCG finds no justifiable cause for those essential functions to be considered unnecessary or potentially replaceable by the development of '*new green spaces*' (LP 2.19 & 2.20)

Further, some Green Belt sites identified for development in the LP are prime agricultural farmland, which at this time of national crisis for the nation's economy and food supplies, should hold the highest level of protection. People need homes, but more people need food. Indeed, the Green Belt land to the East of Tring (TO 2 and TO 3) marked for

development is classified in the DLP Interim Sustainability Appraisal as Grade 2 agricultural land of '*best and most versatile*' quality. (LP Non- Technical summary p15, 4.4.6)

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 proposals 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 clearly met.

- 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, for fishing and boating on the Grand Union Canal, riding, running and cycling, together with valuable agricultural Public access such as that given by Marshcroft Lane, Tring, affords a good quality outdoor experience to people with limited physical mobility.
- 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
- 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 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 significantly diminish the benefits of Green Belt within the Borough to the public.
- Significant wildlife corridors and habitats which have established over decades would be lost through development of Green Belt
- 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, conversion of currently unused urban and rural retail & office sites for low-cost

- This policy has been reinforced since the December 2020 announcement by the Secretary of State for Housing and Communities, Robert Jenrick, that the methodology for calculating housing needs would focus on England's 20 largest cities and urban centres and that policy would aim to maximise use of vacant buildings and under-used land, to regenerate urban communities, rather than new development in green

'We [Government] do not propose to proceed with the specific changes to the standard method that were consulted on. Instead we will proceed with a reformed standard method which reflects our commitment to levelling up and enables regeneration and renewal of our urban areas as we recover from the COVID-19 pandemic.'

Further, that: *' We have listened carefully to the feedback on our proposals, within the consultation and outside of this, including in Parliamenthave heard concerns that the distribution of need was not right. In particular, we heard that too much strain was being put on our rural areas and not enough focus was on the renewal of our towns and cities.'*

And: *'...in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. **We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.'***

(Government response to consultation: Proposed changes to standard method for assessing local housing need 16.12.20)

With due respect, it would seem that DBC has chosen to deliberately ignore this policy.

- Since 2017, 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 '*London's lung*'. 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.

- CCG does not find creation of new green spaces acceptable replications of an existing, naturally beautiful, green and tranquil open Wildlife corridors, habitats and important markers such as hedgerows which have established

over time will disappear. The international monetary exchange rate is not in Britain's favour; it thus becomes even more essential to protect and support the nation's farmers in supplying our own food. Building over green landscapes and good quality farm land (such as that on the Eastern side of Tring) is short-sighted and ill-advised.

- Both Berkhamsted and Tring have green spaces around the towns widely used for walking, cycling, riding, dog-walking, running and a good network of well-used public rights of way which provide access. Residents and visitors would lose what they already have free access to and instead be offered an artificially contrived, man-made green

Included files

Title Question: National Policy and Guidance

ID EGS15453

Person ID 350823

Full Name Mrs Sue Yeomans

Organisation Details Chairman
Chilterns Countryside Group

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTIONS NPPF comment

STATUTORY REQUIREMENT TO MUTUALLY CO-OPERATE WITH ADJOINING AUTHORITIES

- The CCG understands there is statutory obligation for Local Authorities to mutually co-operate with adjoining Authorities across boundaries for supply of
- The LP fails to identify any co-operation with the adjoining Local Authorities of Hertfordshire, Buckinghamshire and Bedfordshire. The NPPF specifically requires co-operation between adjoining Local Authorities, the LP fails to deliver this requirement.

- Discussions and agreements on how to implement this requirement should be under way with deadlines for conclusions before any firm decisions are made on finalisation of the DBC Local
- DBC has failed to comply with the requirements of the NPPF to co-operate with adjoining Local Authorities in meeting housing needs.
- CCG finds the figures for growth to be unreliable in terms of Government requirements and that they fail to take into account Government's recently revised (December 2020) policy focus

on urban regeneration in the North and Midlands and strengthening of protection for Green Belt.

Included files

Title Question: National Policy and Guidance

ID EGS15511

Person ID 400475

Full Name Mr Michael Demidecki

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTIONS NPPF comment Para 20(c) of the NPPF requires '...sufficient provision for...community facilities (such as health...)'. Considering the impact if all the housing suggested for Tr01-Tr06 goes ahead, there appears to be a lack of clear consideration of the infrastructure needed to support this. This is especially true of local health services. New local health services would be needed and should be planned for.

Para 20 (d) of the NPPF requires ‘...sufficient provision for...conservation and enhancement of the natural...environment, including landscapes and green infrastructure...’There is nothing in the Plan about the conservation of existing and historic hedges (some of which along Marshcroft Lane for example are over 600 years old).

Para 24 of the NPPF provides that ‘Local planning authorities...are under a duty to cooperate with each other,...on strategic matters that cross administrative boundaries’.

Para 25 of the NPPF requires that ‘Strategic policy-making authorities shall collaborate...’ With this and Para 24 in mind it is noted that there seems to be inconsistency in the Plan regarding planning for warehousing for Tr01. There would appear to have been no cooperation or collaboration between the Council and Aylesbury Vale District Council regarding the option of providing such warehousing in land alongside the A41 road west of Tring where there is already some industrial building.

Para 34 of the NPPF provides that plans ‘should include setting out the levels and types of affordable housing provision required along with other infrastructure...’ The infrastructure has not been properly considered and it is understood that the housing proposals do not include many affordable homes. Also, with an increasingly empty number of shops in the town centre of Tring some of these properties could be used for personal accommodation.

Para 136 of the NPPF requires exceptional circumstances for alteration of Green belt boundaries. These have not been established for the proposed allocation of sites in Green belt land at Tr01-Tr03.

Para 170 of the NPPF provides that ‘Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity...d) minimising impacts on and providing net gain for biodiversity...’The plan does not give adequate consideration to the valued landscapes and biodiversity of Tr01, Tr02 and Tr03.

Para 174 of the NPPF requires that ‘To protect and enhance biodiversity and geodiversity, plans should a) identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks..., wildlife corridors and stepping stones that connect them...’ There appears to be no such identification or mapping at present for Tr01, Tr02 and Tr03. There are ancient hedges here (for example in Tr03 along Marshcroft Lane that may be 600 years old or more) which are important wildlife corridors, close to SSSIs such as Tring Reservoirs and Aldbury Nowers.

Included files

Title

Question: National Policy and Guidance

ID	EGS15523
Person ID	1162394
Full Name	Grahame Senior
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	
Included files	
Title	Question: National Policy and Guidance
ID	EGS15563
Person ID	1264530
Full Name	BRENDA AND ROY HURLEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>The council has failed to justify the draft plan against the test of exceptional circumstances of Paragraph 137 of the Framework and as such cannot meet the definition of Paragraph 11b)i) so as to justify development in the Green Belt.</p> <p>The expectations of Paragraph 137 with regard exceptional circumstances states that there is a clear requirement to examine ' all other reasonable options for meeting its identified need for development" before being able to justify changes to Green Belt boundaries. The three strands of examination in this regard are found at Parts a) to c).</p>

With regard Part a) there is a requirement for an authority to demonstrate that the Plan makes as much use of possible suitable brownfield and under utilised land as far as possible. The Evidence Base used to justify the strategy for brownfield redevelopment has substantial shortfalls, particularly in relation to settlements outside of Hemel Hempstead that nonetheless are expected to bring forward a substantial provision of housing, such as Tring: A lack of proposed brownfield sites outside of Hemel Hempstead provides a substantial weakness with regard to the Council being able to prove under examination that exceptional circumstances have been met to justify the Green Belt allocation.

With regard Part b) there is an expectation that the strategy " optimises a density of development in-line with policies of Chapter 11 of the Framework, including whether the policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport" . There has been no assessment of whether minimum density standards can be uplifted within an existing settlement as part of the process undertaken by the Local Planning Authority; the Inner Settlement Density Assessment and opportunities associated with Tring and Berkhamsted in particular are non-existent and given the expected substantial contribution towards housing supply outside of settlements in both areas, a requirement so as to justify such incursion into the Green Belt is necessary so as to accord with Part b).

Particular attention should be paid to Paragraph 137 Part c), The council have not proactively cooperated with surrounding local planning authorities within Hertfordshire, Bedfordshire and Buckinghamshire; despite being required to do so to justify their exceptional circumstances position. The plan has therefore failed to accord with National Policy and Guidance.

It is not my place to determine the actual objectively assessed housing need for the Council, I do not ' believe the target housing figure associated with this Plan has met the requirements of an objectively assessed need. Therefore, the Plan's expectation of delivery of 5,945 homes within the Green Belt has not been justified.

Included files	
Title	Question: National Policy and Guidance
ID	EGS15617
Person ID	1271748
Full Name	Ms Gosia Turczyn
Organisation Details	Wigginton Parish Clerk Wigginton Parish Council
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>See comments under Question 4 regarding NPPF Paragraph 11b), in relation to Green Belt and AONB land, which provides "a strong reason for restricting the overall scale, type and distribution of development"</p> <p>Not only has the plan failed to comply with the NPPF but it also fails to comply with the Government guidance, Ministerial Written Statement and the revised indicative housing need figure for Dacorum issued on the 16th of December 2020. It is very unfortunate that such a significant change in Government policy and resulting guidance was issued after this version of the Local Plan was published but it does nevertheless make it out of date and in need of revision before submission.</p>
Included files	
Title	Question: National Policy and Guidance
ID	EGS15774
Person ID	1271978
Full Name	JOANNA HARLEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTIONS NPPF comment	<p>We note the statements in the NPPF Para 11:</p> <p>“The presumption in favour of sustainable development.</p> <p><i>Plans and decisions should apply a presumption in favour of sustainable development.</i></p> <p><i>For plan-making this means that:</i></p> <p>1 <i>plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;</i></p>

- 2 *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - 1 *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - 2 *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”*

We have previously said we remain unpersuaded on the assumptions made that lead to the number of dwellings proposed to be built over the Plan period. There is an assumption in the Draft Plan that there is demonstrable benefit that outweighs the disbenefits of the proposed release of land from the Green Belt. We dispute that this is the case certainly around Berkhamsted and Northchurch where sub para i and ii should take precedence and be applied.

Comments such as sustaining vibrancy etc are not accompanied by evidence to support the argument.

- Maintaining supply and delivery

Para 73 *includes the comment: Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.*

This invites the question on what is the appropriate number for the local housing need: in this Borough the need is for dwellings at ‘affordable cost’ or ‘social rent’. The footnote 37 [Page 20] states:

Where local housing need is used as the basis for assessing whether a five-year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.

This introduces a contradiction and conflates open market housing supply with housing need. This leads to a further increase of dwelling numbers, in excess of what the ONS data is projecting, and locally, to significant demand for Green Belt land release beyond the urban capacity.

The strategic policy adopted in 2013 set an annual requirement of 430 dpa; the ‘local housing need’ may be greater than this number, but even so that is larger than the number projected from the 2018 ONS data.

C. Green Belt – releases

The Draft Plan sets out to meet the stated number of dwellings as required or calculated by the ‘standard method’ determined by the Ministry, with a modest buffer. Para 19.6 and 19.7 of the Draft Plan make reference to Para 136 of the NPPF viz:

Until the adoption of the Draft Plan, the final sentence should read:

It is proposed to release Green Belt land to enable the delivery of the spatial strategy for Dacorum.

NPPF Para 137 says:

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- 1 makes as much use as possible of suitable brownfield sites and underutilised land;*
- 2 optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- 3 has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

We note the 2017 consultation identified Urban Capacity as 10,940 dwellings. We shall leave it to others to determine the technical aspects of a) and b) but we cannot agree that the site locations selected for Berkhamsted [and Northchurch] can be considered as *'other locations well served by public transport'*.

We look forward per sub para c) to learning whether discussions with neighbouring authorities prove fruitful.

Included files

28 Any Other Question Report

28 Question: Any other comment

Title	Question: Any other comment
ID	EGS20
Person ID	1253654
Full Name	Jodie Bell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	As per my previous comment on finding other places to build other than green belt sites or sites that are too packed with houses etc. There is this site currently for sale in Pitstone which would be perfect for housing or a supermarket/retail park. and this disused office building. Again perfect for housing.
Included files	CC1B3087-54A5-4227-A8AD-BC48AF1E8C3B.jpeg
Title	Question: Any other comment
ID	EGS29
Person ID	1253801
Full Name	Moira Lea
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	

* No	
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS67
Person ID	1254719
Full Name	Kathryn Carter
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	<p>The world has changed since the Pandemic, the resulting implications of employment and the local economy need to be taken into account.</p> <p>The current plan is now obsolete. Hemel Hempstead needs to grow in size in order to gain more traction, power and strength both politically and economically. The building of new commercial and domestic property and infrastructure should be concentrated in Hemel Hempstead. The market towns of Tring and Berkhamsted should not be burdened with the extra housing which will destroy the character and quality of these places.</p>
Included files	
Title	Question: Any other comment
ID	EGS100
Person ID	1255447
Full Name	Andrew Sparrow
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I support the Plan and the accompanying Evidence Base, and I would like to record my opposition to any competing development to the east of Berkhamsted, whether under the Bulbourne Cross proposal or otherwise.
Included files	
Title	Question: Any other comment
ID	EGS155
Person ID	1253620
Full Name	John Howard
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Trying to summarise all the sections set out in the DBC strategy plan has been a bit of a task. So with out to much detail I will give my honest comments.</p> <p>ECONOMY BOOST The idea to increase the business content within Dacorum is always going to be a big winner along with the proposed new roadways to support these.</p> <p>TRANSPORT An improved transport network will bring the idea of using local public transport into the minds of local residents, but do not try to demonise the use of private transport for trips to the town centre or to rural settings.</p> <p>TOURISM To improve local area's to attract tourism and day visitors' needs to work within the designs of, once again, public transport and private transport. Maybe review possible use of park and ride car parks.</p> <p>BUSINESS The plan to use land next to the A41, A414, M1 and possibly the M25 for new business would be a good logistical enticement to bring in new companies.</p> <p>ENVIROMENT The development of "brown field sites" for housing and business indicates that the DBC is attempting to do its best for the environment. But along with this I don't see any driving plans for Green and Renewable energy sources such as bio mass boilers, solar panel farms or wind turbines.</p>

AFFORDABLE RENTED HOMES One of my main concerns with the massive home building plan is how many new properties will be owned by the DBC under the ARCH (Association of Retained Council Housing) scheme. Plus will the rentable price be at affordable social rents. It has been shown that housing associations tend to charge a higher rent on like for like properties owned by the DBC.

COMMUNITY INVOLVEMENT With regards to the new planned housing estates will the populous of the existing local communities have a voice and positive input into the communities at the planning stage? If these do go ahead, will the community supporting inferstructures be built e.g. Shops, Doctor’s surgeries, community centres, before the housing estates are started? My point being if these are not in place once the new residents have moved onto the new estate, other local amenities will be over whelmed.

APPROPRIATE USE OF LAND FOR DEVELOPEMENT I strongly feel that the land allocation for Traveller and Gypsy pitches would be put to far better use if used for permanent dwellings. You would get more homes than caravans onto that allocation of land. By the nature of Gypsy and Travellers, they just move on, who’s to say these sites may not be fully utilised, if not left empty.

GREEN BELT & CONSERVATION My final concern is the potential harm to our Green Belt land and conserving the natural environment not just to the flora but also our hidden fauna that could well be displaced by the planning housing and business plan. I would like to see a statement of intent that the proposed plan adhere to agreements regarding both our Green belt land and Conserving the natural environment within the DBC so it is seen to pay lip service to this issue.

Included files

Title Question: Any other comment

ID EGS268

Person ID 1207707

Full Name Mike Beavington

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment
No comment

Included files

Title	Question: Any other comment
ID	EGS332
Person ID	1259852
Full Name	Imogen Wagstaff
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I appreciate that Dacorum needs a local plan but I would like to see a community led local plan which directly addresses the climate emergency and is forward thinking and visionary in addressing this. I believe the current plan is developer and profit led with only lip service paid to important factors such as community, environmental and climate sustainability.
Included files	
Title	Question: Any other comment
ID	EGS396
Person ID	1260080
Full Name	Anne Mills
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	It is clear that the development team do not live or work in Tring. Essentially a market town, Tring is not able to sustain the level of building proposed. No level of thought has gone into how the small town of Tring will support so many new residents who all have 2/3 cars and children. Doctors are already at capacity as are dentist and school and ancillary support groups. Road infrastructure will not sustain more car users and I worry for a major accident and the accessibility

of emergency vehicles through the town. In addition taking away most valued open space which has become more used and vital during Covid will be lost and never replaced. Please rethink your plans to reduce the impact on our small and precious town. Thank you.

Included files

Title Question: Any other comment

ID EGS429

Person ID 1148744

Full Name Richard Carr

Organisation Details TFL Planning Team
Transport For London

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the Emerging Strategy for Growth

Included files

Title Question: Any other comment

ID EGS497

Person ID 1258240

Full Name Adele Giles

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No	
QUESTION ANY OTHER COMMENT comment	<p>I do feel that this plan is out of date considering the effects of the pandemic on the ways people work and shop; and it hasn't taken into account the change in the government's housing algorithm.</p> <p>On a separate note, this planning portal is clunky and not very user friendly. Added to this, on many occasions the comments pages were unavailable, the site froze, etc. That coupled with sheer amount of documents one has to plough through makes the whole, a very off-putting prospect for a lot of residents, I am sure. It has taken me about a week's worth of sessions, several hours long to get to this point and I haven't managed to read all the supporting documentation available. I would also like to say that there is an over reliance on abbreviations and professional language in some sections of the documents which also makes it difficult for the lay-person to digest.</p>
Included files	
Title	Question: Any other comment
ID	EGS548
Person ID	1141491
Full Name	Mr John Whiteman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>This is the wrong time to be aspiring to carry out a long-term strategy. It is clear that the Covid pandemic has accelerated some changes and dramatically altered a number of assumptions about the nature of work, travel, shopping, and services. It will take some time after the pandemic is controlled for the lasting impacts to become evident but it is clear that they are major and permanent. A plan drawn up in such an uncertain time cannot claim to be evidence-based.</p>
Included files	
Title	Question: Any other comment
ID	EGS553
Person ID	1253595
Full Name	Ian Lindsey

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Thank you. I've managed to register but I can find no way to comment via your website, hence this email. Firstly the registration process was very difficult and I do wonder if this is deliberate to avoid getting any comments. If it was deliberate, then your IT Director needs to be given suitable 'administrative guidance'
Included files	
Title	Question: Any other comment
ID	EGS564
Person ID	1260936
Full Name	Peter Hadden
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I have repeatedly tried to open the Comment Box for Question 28 Any Other Comment but the Comment Box that opens refers to Section 26 Evidence Base. Please attach the following comment to Question 28. Not included in the Dacorum Plan is a proposal to develop a site known as Bulbourne Cross, the developer is Thakeham. Thakeham have mail-shotted extensively in Berkhamsted and have a website with details of their proposals. I would like to object now to any consideration of this site being added at a future date to the Dacorum Plan. The plot Thakeham have earmarked is: 1. Further from the town centre than the proposals in the Dacorum Plan hence increased car journeys and adverse impact on the environment and additional strain on town centre parking.

2. The site is directly opposite and only the width of the London Road from an area designated as AONB. The Thakeham site and the AONB area are on opposite sides of a steep-sided valley so the visual impact on the setting of and views from the AONB would be enormously detrimental.

3. The site of the proposed development is on Green Belt land which separates Berkhamsted from Bourne End and, in turn, Hemel Hempstead and is a perfect example of Green Belt that fulfills its primary purposes of:

- i) Checking sprawl
- iii) Preventing merging
- iv) Safeguarding countryside
- v) Preserving the setting and character of historic towns

Included files

Title Question: Any other comment

ID EGS565

Person ID 1260936

Full Name Peter Hadden

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION ANY OTHER COMMENT comment

I have repeatedly tried to open the Comment Box for Question 28 Any Other Comment but the Comment Box that opens refers to Section 26 Evidence Base. Please attach the following comment to Question 28.

Not included in the Dacorum Plan is a proposal to develop a site known as Bulbourne Cross, the developer is Thakeham. Thakeham have mail-shotted extensively in Berkhamsted and have a website with details of their proposals. I would like to object now to any consideration of this site being added at a future date to the Dacorum Plan. The plot Thakeham have earmarked is:

1. Further from the town centre than the proposals in the Dacorum Plan hence increased car journeys and adverse impact on the environment and additional strain on town centre parking.
2. The site is directly opposite and only the width of the London Road from an area designated as AONB. The Thakeham site and the AONB area are on opposite sides of a steep-sided valley so the visual impact on the setting of and views from the AONB would be enormously detrimental.
3. The site of the proposed development is on Green Belt land which separates Berkhamsted from Bourne End and, in turn, Hemel Hempstead and is a perfect example of Green Belt that fulfills its primary purposes of:
 - i) Checking sprawl
 - iii) Preventing merging
 - iv) Safeguarding countryside
 - v) Preserving the setting and character of historic towns

Included files

Title Question: Any other comment

ID EGS575

Person ID 1261023

Full Name Richard Brash

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
 * Yes
 * No

No

QUESTION ANY OTHER COMMENT comment

Over-reliance on aspirational growth strategies and partnerships which have not been subject to public consultation and scrutiny.
 The Emerging Strategy for Growth appears to be based on selective strategy documents* that have no formal planning status and which have not been widely consulted on. As a result, the Strategy has failed to take account of a number of

important issues - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs.

The pursuit of economic growth as promoted by the Hertfordshire Local Enterprise Partnership and implied by background work for a South West Herts Joint Strategic Plan should be balanced against environmental concerns and climate obligations before they are tested through the local plan process.

*Dacorum Growth & Infrastructure Strategy to 2050, Dacorum Corporate Plan 2020-2025 and Corporate Action Plan

Included files

Title Question: Any other comment

ID EGS588

Person ID 1260922

Full Name colin Lillicrap

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment It is appreciated a great deal of work has gone into preparing the plan and the Borough is required by central government to prepare such a plan under threat of having one imposed on them. The fundamental problem is the targets set by central government are wrong for the country and Borough. The targets are inconsistent with government's declared policy of 'levelling up' the country. There needs to be a fundamental rethink taking account of the impact of Covid-19 and new technologies on working practices which change the way people want to work and where they want to live. Any plan needs to encourage people to move away from the overcrowded and expensive south east of England.

It is Dacorum's responsibility to investigate if the targets proposed by central government are both suitable and achievable for towns like Berkhamsted and Tring. Instead Dacorum has set out to identify land that the target number of houses can be built on. Dacorum must first develop a balanced evidence based case for the need for new housing in Berkhamsted and then explore all options to meet that need only using green belt land as a last resort. Dacorum must put the welfare of the community it is responsible for before the interests of developers. Dacorum has been negligent in not putting forward a balanced evidence based case for the number of new houses needed in Berkhamsted.

Included files

Title	Question: Any other comment
ID	EGS613
Person ID	1261164
Full Name	Bruce Shepherd
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Whilst the plan looks like a very comprehensive and professional document, I did not vote for this, and I certainly disagree with Tring being vandalised by so many new homes, within the supposed 'Green belt'. No doubt there are pages of 'fudge' about looking for brown-field site alternatives and finding nothing suitable; I very much doubt the veracity of any such comments given the number of possible estates and smaller areas that could have been re-purposed. Good luck to anyone seeking to stop this travesty.
Included files	
Title	Question: Any other comment
ID	EGS648
Person ID	1261183
Full Name	Oliver Fairfull
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	Growth at any cost is not the answer. The "vision" mentions sustainability throughout, but none of this growth is sustainable. Overloading areas with a population it cannot support will be detrimental to the countryside, farm land, green space and

the lives of those who have chosen to live in the area. Steady and monitored growth means strategic thinking and adapting to changing conditions. Build the infrastructure and only then, grow in line with that. The policy as it stands is to build at a rapid rate, seemingly at any cost.

My experiences are of living in Tring, but it is likely the sentiment is echoed all through the Borough. For example, it is already hard to get a doctors/dentist appointment. Increase healthcare capacity, then grow the community.

The employment growth you are forecasting is simply a proposal and not a reality. We simply can't know what the economic situation will be – some of your plan may succeed, but others will likely falter. Build the economy, then build the housing.

Tring is a commuter town and a (significant) proportion of new inhabitants will likely commute to London on a trainline already at capacity. Station car parks are full before rush hour is over - where is the proposal to increase that capacity?

You mention building a better link between Tring and the station, build it first and demonstrate that it works. What is currently in place is dangerous for pedestrians, cyclists and drivers. A small cohort will cycle in any weather, many (including me!) will not and will resort to driving. You also can't change the existing road infrastructure; Tring high street is extremely narrow. A single vehicle stopping (eg deliveries, mail van) backs up traffic. Increasing housing in Tring by such radical numbers will result in far more congestion and pollution – flying directly in the face of your environment plan.

It's easy to demonstrate now that people drive to the town and do not walk, and an increase in population will result in increased traffic, particularly as the green belt sites are some distance from the town centre.

Residents in this area should not be made to pay for short sighted thinking. The proposal to build vast numbers does one thing; makes developers very rich. They will build the standard "cookie cutter" houses, with minimal space between properties, minimal parking and a minimal green space. Once they have been paid, they will leave and having irreparably changed the face of the town, we, and future generations will be left to suffer the consequences.

These new estates seen all over the country are the modern equivalent of tower blocks build in the 60s. We will look back in 50 years and wonder why anyone thought they were a good idea. The example to the west of Tring is a key demonstration of this. Decorating the house that face the main road with a pretty stone façade is just that, a façade. Look within the roads and you see narrow houses, squashed in at the edge of town, forcing people to drive to town. Maximising profits for developers, ignoring the real needs of the town inhabitants.

In the original "vision", I believe the proposed number of houses in Tring was between 600 and 1100, which seemed absurdly high. You have now raised this to 2,731 (an odd number, how can you be so exact? Presumably because this was calculated by a formula rather than rationale thought) but cannot see any justification for that alarming increase. I made the same points then, grow the infrastructure and then grow the housing stock, not the other way around. Targets are not the answer. Destroying green belt and farm land is not the answer. Once you have made these mistakes, we cannot go back.

This may be mandated from Westminster, but your job as our local representatives is to fight back. I am not anti-growth – our population is expanding, but we need to grow in a sustainable, controlled way, not mandating the growth of a town by 40-50%. I spent many hours reading through the 2017 documents and responding. Now to find out that you are “doubling down” on expansion at such a rate is very disheartening. Many people do not have the time to read through

such lengthy document and reply but their lack of response should not be taken as de facto approval. We love where we live. Please, take the time to make the right choice and not put this monstrosity of a plan into action.

Included files

Title Question: Any other comment

ID EGS673

Person ID 1261122

Full Name Mark Slade

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

No

QUESTION ANY OTHER COMMENT comment Most of it doesn't make sense, pays no respect to existing residents and fails to admit the harsh reality that this will create housing that people don't want to live in (albeit they will be forced into the compromise). Development will not enhance anything, just undermine it.

Included files

Title Question: Any other comment

ID EGS762

Person ID 211245

Full Name Ms Jody Conibear

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

No

QUESTION ANY OTHER COMMENT comment	As a Tring resident, the plan is deeply disappointing and upsetting to me from the perspective of the green belt development in an area of outstanding natural beauty, bring huge future congestion to this area and undermining the great work that the Tring community has done to preserve its past and look after its future. This plan is not workable and will lead to vastly impacted lives, nature and generations of the future.
Included files	
Title	Question: Any other comment
ID	EGS846
Person ID	1261436
Full Name	SALLY MARSTON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The fact that these proposals are being pushed through at a time when people are occupied with coping with a pandemic suggests a loss of our democratic rights which is the worst thing of all about this proposal.!!!
Included files	
Title	Question: Any other comment
ID	EGS863
Person ID	211406
Full Name	Ms Jennifer Habib
Organisation Details	Chiltern Society Planning Field Officer for Dacorum Chiltern Society
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	The consultation is very poorly timed and extremely premature given the government's intention to review housing figures. Also, the pandemic has severely limited the consultation procedure which has disenfranchised a section of the population which does not have access to the internet. Dacorum has already ignored pleas for the consultation to be delayed and has merely offered an extension of a couple of weeks to the time period. <u>This does not bode well for their consideration of people's comments on the Plan.</u>
Included files	
Title	Question: Any other comment
ID	EGS885
Person ID	876510
Full Name	Mr Simon Ware
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I understand that the way central government has dictated the number of new houses needed in Dacorum, but I also do not agree with this method for the following reasons: <ol style="list-style-type: none"> 1 Central government should be looking at the country as a whole and not piecemeal. 2 There are areas of brownfield land outside of the home counties that could meet all of the housing needs. This would give much needed investment into these areas and make the north-south split less pronounced. 3 With Covid there is likely to be numerous commercial offices lying empty within inner cities, which should be considered for conversion to residential first rather than building on greenbelt.
Included files	
Title	Question: Any other comment
ID	EGS896
Person ID	1261484

Full Name	Simon Wraight
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	<p>I could not find any mention of sewage capacity. How has this been considered? We already get sewage problems in the valley of Berkhamsted, as with the drainage of surface water, anything not dealt with will overwhelm the lower parts of the town.</p> <p>While the report mentions the importance of exercise and swimming pools, I saw no mention of new swimming pools. As a parent, it is already difficult to find swimming lesson vacancies, how will the increased number of children effect the swimming lesson vacancy shortage that we already face?</p>
Included files	
Title	Question: Any other comment
ID	EGS919
Person ID	1158931
Full Name	Mrs Juliet Chodzko
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I have already commented on the Plan with particular reference to Berkhamsted and expressed my considerable disapproval. Having now read additional comments from BRAG, the Chiltern Society and CPRE, I feel that the whole Plan has many flaws. Apart from the massive environmental impact, especially with regard to the aquifers and fragile chalk streams, the calculations were based on a faulty algorithm. Additionally, no concern seems to have been given to the effects of the pandemic. Surely there will be many commercial and retail sites which will remain empty and these</p>

could be used for housing instead of encroaching on Green Belt Land and permanently blighting what is still an attractive area on the edge of an AONB. I hope that the Plan will be revised.

Included files

Title Question: Any other comment

ID EGS924

Person ID 1264329

Full Name DOMINIC MILLER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

WOW you have said it all. Except for the answer to my question WHO are the houses for at what cost?

The consultation is very poorly timed and extremely premature given the government's intention to review housing figures. Also, the pandemic has severely limited the consultation procedure which has disenfranchised a section of the population which does not have access to the internet. Dacorum has already ignored pleas for the consultation to be delayed and has merely offered an extension of a couple of weeks to the time period. This does not bode well for their consideration of people's comments on the Plan.

Included files

Title Question: Any other comment

ID EGS931

Person ID 1261540

Full Name Ms Claire Taylor

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Another consideration is the need for affordable housing in the local neighbourhoods, the need is much higher in St Albans and in Watford, but the majority of the housing is to be supplied from Hemel Hempstead, what are these councils doing to meet the need within their own boroughs? Does Dacorum council financially benefit from providing this housing to the other boroughs? If so will this be fully disclosed? And what green belt land is available within these areas to fulfil the demand for additional housing prior to Dacorum releasing its green belt land.
Included files	
Title	Question: Any other comment
ID	EGS935
Person ID	1261540
Full Name	Ms Claire Taylor
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I believe the above should be considered, researched and answered with adequate debate from local residents prior to the development progressing any further. To clarify the above mention of 'adequate debate' constitutes a minimum of two open forums with the planning officer of the strategy outside of core office hours (8-6) to enable most residents to participate and be heard to fulfil the council's objective 'to develop a shared vision to shape their neighbourhoods'.
Included files	
Title	Question: Any other comment
ID	EGS955
Person ID	1205804
Full Name	Mrs B. Watson
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Please protect the existing greenbelt and only allow development of the brownfield sites first. Please don't touch the greenbelt until all the brownfield development sites are completed
Included files	
Title	Question: Any other comment
ID	EGS1002
Person ID	211239
Full Name	Mr Alan Wade
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	It is hard for someone not very computer literate to find out additional information a to the precise area covered.
Included files	
Title	Question: Any other comment
ID	EGS1010
Person ID	1261650
Full Name	Mrs Kirsty Drury
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Carrying out this public consultation during a period of national lockdown is a disgraceful act and only heightens suspicion that it is not being carried out in good faith.
Included files	
Title	Question: Any other comment
ID	EGS1026
Person ID	1261658
Full Name	MR PETE DRURY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Carrying out this public consultation during a period of national lockdown is a disgraceful act and only heightens suspicion that it is not being carried out in good faith.
Included files	
Title	Question: Any other comment
ID	EGS1031
Person ID	399849
Full Name	Mrs Beryl Edwards
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The questions posed by Dacorum Borough Council are written such that only professionals like architects, surveyors and planning officers can understand them. I have, personally, found it quite difficult to comment, and so I am responding in the following way.
Included files	
Title	Question: Any other comment
ID	EGS1104
Person ID	1261701
Full Name	Raeeka Yassaie
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	The government is using out-of-date 2014 ONS projections. I am not happy it has been calculated appropriately, and we definitely want to avoid a situation where houses are built and there is insufficient demand. Overall I do not support the proposal with the numbers given and believe we are doing the environment, the town and it's people an injustice if we pursue this plan.
Included files	
Title	Question: Any other comment
ID	EGS1180
Person ID	1143779
Full Name	Ms Julia Marshall

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS1212
Person ID	1261875
Full Name	Fiona Silver
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	<p>There appears to be a mistake in this form as the section is for 'any other comment', but the question listed is specifically about the Evidence Base. I will use this space for Any Other Comment.</p> <p>As a long-term resident of Dacorum I feel betrayed by these proposals. There appears to be a fundamental flaw at the heart of them whereby they try to meet a supposed housing target that is not in fact a housing target. To meet this target requires permanent, unsustainable destruction of Green Belt land that was created for the express purpose of preventing urban overdevelopment. In the case of Berkhamsted, the proposals also go directly against the Core Strategy developed in 2013. In the Core Strategy, numerous points were made about why areas of development such as that suggested for South Berkhamsted were unsuitable. And yet now, because there's supposedly a target to be met (though there isn't), all these still valid arguments are being ignored.</p>
Included files	

Title	Question: Any other comment
ID	EGS1252
Person ID	1259116
Full Name	Tring in Transition (TinT)
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	<p>The Plan, for reasons that are not clear, conveys a message that growth far in excess of that necessary, along with the significant loss of Green Belt, is a <i>fait accompli</i>. This is in stark contrast to previous versions of the Plan and is not aligned with the clear wishes of the vast majority of the Borough's population.</p> <p>Despite many welcome, positive intentions expressed in the Vision and Strategic Objectives, the Plan feels – at present – more like a 1980s', developer-led charter than a guide appropriate for the 21st century.</p> <p>We believe that Dacorum would be strongly supported by its populace if it grasps the opportunity to make a few significant and bold changes. Many local groups would be willing to share the workload.</p> <p>In particular, there is scope to be bolder: presenting evidence to push back on Government targets, being less reliant on developer proposals; and recognising that the role of a Local Plan should be as much about the proactive development and protection of our natural environment as it is about developing and enhancing our built environment.</p> <p>On Housing Growth</p> <p>The real reasons for the excessively high housing growth numbers in the Plan are not explicit – especially for Tring where the relative increase in almost three times higher than the next most impacted town (and this in an area which, even according to presented evidence, is least well suited to such an increase in terms of adverse impact on the environment). The proposed numbers are already in excess of that required by the Government. We would point out that Dacorum Council is well within its rights to push back on these numbers (even if they are reduced significantly) when it can be shown to result in inappropriately high impact on other important measures. We have touched on many of these earlier in our response.</p> <p>If the numbers were driven by calculations for generating a required level of CIL income (e.g., the notion that excessive extra houses have to be built in Tring in order to fund a new secondary school – which is only required because we are</p>

building so many new houses) then these assumptions need to be fundamentally revisited. Again, if the numbers do not work out it is further grounds for pushing back on growth, NOT to accelerate it.

On Loss of Green Belt

In the 21st century Green Belt becomes arguably more important. This was once recognised in Dacorum's own strategic planning guidelines. There is a strong case that Green Belt should, in fact, be proactively enhanced in order to help meet carbon-emission and biodiversity goals, provide the sort of wild green recreational spaces that are increasingly in demand, and also provide economic growth (recognising that Dacorum – and especially Tring – is increasingly becoming a green 'destination' space).

There is virtually no evidence that this perspective on Green Belt has been acknowledged or understood by the authors of the Plan. This need to be urgently revisited.

On Distinctive Developments and Vision for the Future

The need for 'distinctive' development is mentioned several times in connection both with the natural and built environments (e.g., '*All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place.*' – Overarching Vision, page 22).

It is not clear how this will be either defined or agreed for Tring, which is arguably the most distinctive settlement in Dacorum in terms of natural setting, social and economic history. Neither is it clear how this will be given 'teeth' in order to proactively shape development.

There is a real opportunity here for Dacorum to create an exemplar Plan and an opportunity to work with local groups sooner rather than later.

In the absence of a working definition, Tring in Transition has created an initial description of what makes Tring distinctive to help shape what we would expect to see in the final version of the Plan. This highlights our unique heritage and location, including:

- A Rothschild legacy of forward-thinking development, respect for the environment, bold and challenging designs and solutions.
- A strong heritage of local renewable energy with significant wind and waterpower.
- A location surrounded by more than 50% of Dacorum's SSSIs, extensive AONBs, as well as extensive hedgerows and other wild places.
- A service-oriented, agricultural, market legacy and a traditional destination location to visit, meet, relax and socialise.

From these we have also developed four distinct 'visions' for improving the standard of developments in Tring. Each responds to one or more of the deficiencies in the Plan and builds on Tring's distinctive features.

All of them are based on schemes already seen elsewhere. These are not blue-sky concepts and are easy to adopt:

1 'Tring Fields'

To help proactively address any loss of Green Belt and meet NPPF guidelines to mitigate the same:

The overarching theme is that each existing field will provide the basis of the layout of any future development. Each will have a purpose, an individual ‘personality’. This may be a cluster of housing, an informal green space, a school, a services unit or a health clinic.

By basing the development physically on the existing field system, we propose that Tring Fields will create an attractive new development in keeping with the adjoining AONB and Green Belt area in which it is built and by which it will be surrounded.

- It keeps the existing green infrastructure of hedges and field boundaries – meeting the requirement for joined green corridors and informal green spaces.
- Marshcroft Lane becomes the crowning glory of the development, the central draw and attraction, remaining as a quiet lane with the proposed link road NOT cutting across it.
- The houses are built in clusters in the existing fields, each complying to high energy efficiency standards.
- Each cluster will have a particular design and character (an approach already used successfully elsewhere in the UK).
- Community spirit is created by the intimate feel of the individual clusters which still remain part of a greater whole.

1 ‘21st Century Market Town’

To address the need for growth, enhance the existing town centre and correct assumptions apparently carried over from previous planning exercises (traceable back to the 1990s).

We proposed taking a lead from existing ‘21st-century market town’ schemes successfully being deployed in Yorkshire, Stroud etc. In summary, this includes recognising the limited need for new town centre retail space; acknowledging that central supermarkets are more damaging environmentally than those designed to limit travel and traffic congestion; and acknowledging changing employment patterns and social norms (this is especially true for Tring).

- Replace proposals for significant new retail space and encourage more food, experiential, social, entertainment and ‘destination’ spaces etc.
- Revisit plans for a central supermarket (which will only add to issues with existing traffic hot spots) and recognise the patterns of use from those living in villages to the north of Tring. (Depending on revisions to developments – this could well be at the Bulbourne side of town.)
- Remove proposals for warehousing and large industrial units on the Dunsley Farm site and build on Tring’s heritage as a service-oriented market town by building smaller, more flexible workspaces that reflect rapidly growing local/home-working patterns.
- Revisit plans for Tr06/Brook St: prioritise schemes fronting to the High Street, encouraging food, social and ‘destination’ spaces.
- Recognise that Dunsley Farm is better suited to residential home development than light industry – meeting both social and employment needs.

1 ‘Linked Wildlife Corridors’

To address pressures on local green spaces, SSSIs, biodiversity and Green Belt loss.

The definitions of open spaces, green spaces, green buffers and wildlife corridors need to be more explicit. They are a consistent cause of confusion and question in the Plan. There is a need for all of these, but given the high number of SSSIs around Tring, AONBs, the Beechwood SAC, etc. **there is an opportunity to establish a country-leading if not world-leading scheme where defined wildlife corridors are proactively established around the entire perimeter of the town, through new developments and onwards to local nature reserves etc.**

- Implement joined-up wildlife corridors through and around all new developments.
- Explicitly plan to proactively link all SSSIs via wildlife/green corridors.
- Provide managed public access through a new network of paths.
- Provide an opportunity for the various organisations managing local wild spaces (Woodland Trust, National Trust, Wildlife Trusts, Chiltern Society, Rothschild Estates etc.) to work together with the Council to design and build this. (An initial poll of these organisations indicates a strong willingness.)
- Recognise NPPF requirement that any Green Belt development requires explicit mitigation and improvement on *other* Green Belt land. (The inclusion of green and open spaces in existing Green Belt parcels earmarked for development does not count towards this.)

1 ‘Sustainable Energy Use’

To address county and national carbon targets and to reinvent Tring’s legacy of renewable energy use. We acknowledge statements about going beyond current government guidelines on new housing insulation. This sounds good but will already be superseded by more demanding targets before we are halfway through the term of this Plan. We are also aware that developers have pushed back with statements like ‘we don’t find a market for solar panels’ etc. These are, frankly, irrelevant and should be entirely disregarded.

Developments around Tring have a clear and new opportunity to embrace the highest possible standards that can be mandated (if not higher):

- All new developments built to highest possible standards of carbon neutral build and energy efficient operation.
- Renewable energy targets, inclusion of solar systems in new homes etc. (regardless of any developer pushback) should be explicitly mandated.
- See our detailed response to SP24 etc.

=====

Summary

The following is a summary of our key concerns, which are expanded upon in our detailed response below. In addition, given the absence of a distinctive vision for Tring and its surroundings, we have also summarised key visions for how the current Local Plan can be changed and lead to a better outcome for our town, Dacorum and our neighbours.

- 1 A very high percentage of expansion at Tring is proposed to be on Green Belt land and we believe there is a strong case that any developments on former Green Belt land should be **held to the highest possible environmentally**

friendly, sustainability and energy efficiency standards. Explicit provision should be made for this – if we want distinctive, exemplar development this must be mandated. In addition, the NPPF also calls for ‘for compensatory improvements to be made to the environmental quality and accessibility of remaining Green Belt land’ and this must also be explicit with minimum 10% net gain. This is not at present explicitly addressed and is a significant point of non-compliance.

- 1 The proposed growth of over 2700 new homes is not compliant with the heart of NPPF guidance for ‘sustainable development’. It is proportionately by far the largest urban growth across Dacorum in a location that is arguably least well suited for it. It is significantly above the evidence-based proportion for Tring based on population growth through the Plan period as amended by the Government’s ‘affordability’ formula (evidenced in the September 2020 SW Herts Local Housing document).

Even if the numbers decrease significantly after recently announced Government changes there is no information in the Plan about prioritisation for reduced numbers (this needs to be made public) and it is likely the essence of the plan will remain much the same. Therefore, the following concerns remain valid:

- 1 The proposed north–south link road from Bulbourne to London Road via Station Road is ill-defined and cuts through a major wildlife corridor – Marshcroft Lane – and an AONB. It is therefore subject to constraints that have yet to be examined, yet it seems key to the present development plan for Tr03. **No development on Tr03 should be sanctioned until this is fully resolved.**
- 1 The provisions for green/wildlife corridors (especially in Tr01, 02 and 03) are confused, inadequately defined and fall well short of the provision called for in the most recent Herts Environment and Sustainability guidelines (Nov 2020). In particular, the corridors are poorly linked together and do not explicitly protect the hedgerows (including Marshcroft Lane) and the surrounding countryside that are a key part of the character of the area and vital to local biodiversity. **Overall, the plan for Tring falls short of NPPF para 147, and paras 99/100.**
- 1 The proposals for Tr06 (Brook St) are based on assumptions that are no longer valid given other stated goals and the growth in development elsewhere in Tring. **They also miss a clear opportunity to provide distinctive and modern facilities better suited to the mid-21st century.**
- 1 Public transport goals are aspirational only and there is nothing in the Plan that convincingly addresses transport between Tring Station and the town centre or around the new developments, or which supports modern, novel solutions.

- 1 Net carbon neutrality is an essential target and new developments present an ideal opportunity to meet the highest standards. We note DBC policy of 2020 is to be zero carbon by 2030. The Plan makes several references to 'exemplar' development but falls short of explicitly defining standards for energy efficiency (through building standards) and the inclusion of extensive local energy capture (e.g., via solar) etc. The Plan does not set the bar high enough with respect to these at present.
- 1 Tring is flanked on two sides by Buckinghamshire and traffic, town centre use, schooling and employment patterns are influenced very strongly by this. **There is no reference to liaison with Bucks in the plan.** We are concerned that conclusions about the locations of employment, retail and recreational sites are flawed in places and generally sub-optimised as a result. The same is also true when looking at environmental considerations.
- 2 A key and important goal, first built into the Issues and Options (2017) Plan, is for the Local Plan and developments to reflect local distinctiveness. **There is no evidence that Tring's distinctive character (in its history, town economy, unique location, etc.) has been defined, and there is therefore no associated vision; this presents an unacceptably high risk of generic, unsympathetic development.**

Included files

Title Question: Any other comment

ID EGS1311

Person ID 1261975

Full Name John King

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment until the full effects of the Covid 19 are known in terms of future working practices and the effect this will have on where people live are known the implementation of any plan should be shelved.

Included files

Title Question: Any other comment

ID EGS1346

Person ID	1145350
Full Name	Mr Edward Murray
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	No. Per point made in other section 1. Reduction in uk population taking place because of brexit 2. Impact of covid means retail properties will become vacnt and should be reconveretd and used for housing. Not going onto greenbelt land
Included files	
Title	Question: Any other comment
ID	EGS1381
Person ID	1262050
Full Name	Mr Martin Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment

Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite. Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced.

Dacorum should implement a local plan that includes firm and ambitious sustainable commitments. All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.

- The 40% minimum affordable homes objective should be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.
- Trees and woodland are very valuable to the environment and the community's physical and mental health. I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area.
- An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.
- Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside boundaries. These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.
- The Local Plan should allocate land for new allotments for resident of new homes as well as laying out gardens to support 'Growing your own'(which is both sustainable and good for mental health)
- Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be widened. Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.

We are facing a climate emergency and addressing this must be at the absolute core of Dacorum's Local Plan. Currently it is not. We have the knowledge and technology to make good affordable zero carbon sustainable homes. We must demand that the Local Plan prioritises this.

Included files	
Title	Question: Any other comment
ID	EGS1480
Person ID	1262139
Full Name	Michael Hancock
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	In summary, I am very impressed with the whole document.
Included files	
Title	Question: Any other comment
ID	EGS1539
Person ID	217987
Full Name	Mr Chris Watson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Please protect the existing greenbelt and only allow development of the brownfield sites first. Please dont touch the greenbelt until all the brownfield development sites are completed.
Included files	
Title	Question: Any other comment
ID	EGS1546
Person ID	1253872
Full Name	Georgia Huelamo
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Northchurch developments are ill thought out and will cause significant issues with traffic safety (how on earth are people supposed to cycle and walk to town and surrounding areas, if cars are moving from the top of shootersway, down into Northchurch and using Granville Road and Westfield road as cut throughs - have you actually been along these roads to see how damaged some of the cars are - along with all the traffic and congestion from the Church congregation, Northchurch social centre, the schools, the Tesco, etc etc). The Darrs Lane development is a ridiculous idea and will cause immense traffic congestion, air pollution, noise pollution, an eradication of a beautiful green space; eradication of wildlife habitat and wildlife corridors, along with amenable space for residents (we use the wishing tree field for walking, we use Bell Lane for walking). Not to mention the biodiversity of some of these hedgrows and lanes. Additionally, the trees at the back of Granville road adjacent to the field - if these are going to be destroyed by developers I am going to turn into Swampy because these are mature trees with nesting owls and roosting bats with a huge number of different types of birds nesting during March April. These trees should have preservation orders on them.</p> <p>Additionally the view is in the settlement of AONB. Why on earth would you allow this to be spoilt.</p> <p>The water courses are already stretched and the Bulbourne will have further pressure on it. Our chalk streams are some of the loveliest in the country. Why would this government allow these precious habitats to be spoilt.</p> <p>I don't approve of the plan to build on greenbelt land. The National Planning Policy Framework (NPPF) specifically states (paragraph 11b) that Sustainable Development for local plans means, amongst other criteria, meeting housing needs 'unless policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development', listing Green Belt, AONB's and SAC's amongst such 'areas or assets' in footnote 6.</p> <p>Dacorum Borough Council has failed to follow this national planning policy to take these areas, such as the loss of Green Belt and the Chilterns Area of Outstanding Natural Beauty (AONB), into account when proposing the number of houses that should be built. The council have strong reasons to refuse the housing numbers under the NPPF and should do so immediately to safeguard AONB and greenbelt land.</p> <p>There are brownfield areas which are suitable for development - Northchurch garages (there are two sets of them); The area where Majestic wine is (why on earth is that shop there anyway). Parts of the Industrial estate which is underutilised. Tesco Car park in central Berkhamsted. Why do we still need this, we have a multistorey car park fit for a city next to Waitrose. Berkhamsted telephone exchange next to M&S - why is that still there when this could be valuable social housing and allow people to access services and shops. Some of the 'retirement homes' - have they all sold yet? I think not. Convert them to social housing for the mobility challenged. Unused office space and failing public houses . This is just off the top of my head.</p>

My opinion is that this consultation should not have gone ahead in lockdown. I personally found out about this consultation through Facebook. It is just not acceptable that an elected Council be apathetic about their residents not being aware or being able to access information easily and comment on a plan that will affect them and their families and their children now and in the future.

The way this web portal is set up, is confusing, with questions asked of specific policies and seems to prevent the average person to be able to demonstrate their views by restricting it to specific questions. This is not acceptable. The portal should be made easier and more transparent. Its taken much of my time to navigate through the mire of information when all I would like to do, is to put my views across as a resident of Northchurch village. Its just not acceptable and shameful that this Council should consider it adequate.

I dont agree with the plan.

This consultation is also unfair, given the timing of it - over a Christmas holiday period; during a lockdown period when everyone is struggling to hold onto their jobs and home school their kids; where the elderly communities have been unable to travel to view documents; where the community has not been able to attend meetings; where meetings have been held, suffer hijacking of zoom calls. This is an **unfair consultation at the outset**.

The numbers of proposed houses across Dacorum is based on incorrect and out of date data. The numbers do not reflect Dacorum population growth and far exceed sensible numbers which are sustainable. Local and National policies will be contraved in terms of climate change (as discussed above), sustainability and greenbelt land /AONB.

Included files

Title Question: Any other comment

ID EGS1550

Person ID 1262255

Full Name AJ W

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

QUESTION ANY OTHER COMMENT comment	I am dismayed that this consultation has taken place at a time when the whole nation has been distracted by a global pandemic and it is unlikely that this very important subject will have got the attention it would otherwise have done so. The majority of councillors themselves believe that the numbers are wrong and that it is wrong to build on protected greenbelt land yet still this proposal has gone through. Given the timing of this consultation I only hope that enough people have had opportunity to go through this obstructive and lengthy tome and been able to articulate their comments sufficiently that they are taken note of.
Included files	
Title	Question: Any other comment
ID	EGS1599
Person ID	1261849
Full Name	Donald Joyce
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I have tried to use the consultation portal to object but found it incredibly complicated and do not see how it can be considered an adequate method of consultation.
Included files	
Title	Question: Any other comment
ID	EGS1612
Person ID	1261385
Full Name	stephen hearn
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

<p>Yes / No * Yes * No</p>	<p>Yes</p>
<p>QUESTION ANY OTHER COMMENT comment</p>	<p>Growth area TR06 – off Brook Street Tring</p> <p>TR06 comprises Tring Market Auctions, The Tring Local History Museum, the Fire Station and Forge Car Park.</p> <p>Tring Market Auctions is located at the rear of the site of TR06 with access from Brook Street and a license to access the Forge Car Park.</p> <p>The ownership of the site is divided between Tring Town Council (Auction Rooms, Museum and the Market Place <i>hardstanding area</i>), Dacorum Borough Council (Forge Car Park) and Herts County Council (The Fire Station). The Freehold ownerships make it a somewhat complicated issue should planning proceed.</p> <p>In the proposal, no mention has been made for Tring Market Auctions to be included in the future plans of TR06, but mention has been made that if the site is re-developed Tring Market Auctions would be offered an alternative site in the town – where? The Auctions currently comprise about 16000 sq ft of buildings alone together with the adjoining parking areas. No detail has been provided and no mention of re-location provisions has been made. It appears the proposals are an afterthought to the Dacorum local plan. Tring Market Auctions occupy under the terms of a lease with Tring Town Council.</p> <p><u>The History and Current use of the Site</u></p> <p>In 1893 under the requirements of the Board of Agriculture and with the assistance of Lord Rothschild, the sale room with office was constructed in Brook Street. It was let to W Brown & Co. who conducted the first sale by auction in January 1894, since when auctions and sales have been held continually on the site for over 125 years – surely this qualifies the location to be part of Tring’s heritage.</p> <p>During recent years from 1960 there has been numerous enquiries and planning applications to develop the site with offices and supermarkets together with residential, all of which have been rejected.</p> <p>In 1993 the livestock auction ceased to operate leaving the chattel auction business to continue and flourish under the directorship of Stephen Hearn who took Tring Market Auctions to become independent and grow into the fine company it is today.</p> <p>It now has an extensive complex of four Auction Rooms, forming one of the largest and best known venues of its type in the Home Counties.</p> <p>The sales attract a very large number of vendors and buyers from Tring and the surrounding towns and villages together with an ever-growing number of people from throughout the Home Counties and Internationally. Many of the buyers represent the trade and other specialist collectors in all categories.</p> <p>The auctions provide a friendly and entertaining atmosphere on sale days making it an enjoyable venue for both business and pleasure. Regularly around 500 visitors attend on viewing and sale days, many of these attending the auction visit the town shops and local attractions.</p>

Tring Market Auctions is a unique and key component of the town's economic town centre fabric. It provides a key fulcrum for maintaining the town centre economic sustainability. Visitors to the auctions provide business for other local shops and enterprises not just on sale days but across all the sites activities, its town centre location is fundamentally linked to many other local business and the town market continued sustainability.

The auction rooms provide a unique component part of maintaining Tring Town Centres' viability and supporting Tring based economic development. If Tring is expected to grow then business, jobs and economic infrastructure growth needs to be matched, Tring Market Auctions needs to be maintained as it supports this economic ambition of the Local Plan through continued town centre provision of a business that is complementary to local shops and does not provide competition, as would the proposed supermarket.

The Saleroom operates with a permanent staff of some 20 people which includes consultants and additional part time staff during sale days. The venue is a key local employer, bringing training and development and job opportunities for local young people.

The Auction sales deal with all periods of furnishings and collectables, processing over 50,000 lots each year providing an effective and affordable house furnishing option for many local people. It has a growing importance as a recycling centre, particularly when it is estimated over 20 tonnes of furniture timber is recycled every fortnight, which supports the climate ambitions in the Local Plan.

In addition the Auction provides a key income stream to the Town Council reducing precept impact on local residents and contributing to a sustainable model of local government

The Auction provides a service to both the local community and professional organisations throughout the Home Counties and beyond.

Points of Consideration

- It is positioned on a site with a long history of auctions and marketing of stock
- It is an important asset for the Town
- The auction attracts a large number of visitors to Tring throughout the year
- It employs local townspeople
- Town Centres should reflect the distinctive characteristics of a Market Town
- The site would not lend itself as a supermarket, particularly when this proposal is unproven
- The Auction Rooms occupy a strategic position at the head of an open space and wildlife corridor which runs from the Tring Park Mansion vista through to Icknield It is very much part of the local community, supporting many of the Town's organisations and groups

Planning Matters for Consideration

- Brook Street has a notorious reputation for being dangerous in parts where it is very narrow making it often difficult for vehicles to pass
- Tring High Street has introduced traffic calming measures

- It is suggested in the development plan that a supermarket would be served with a new carpark. Bearing in mind the development would include the existing Forge Car Park, does one interpret this as denying the town parking facilities
- Recently, two large planning applications have been refused in Brook Street both in close proximity to TR06, one being the residential re-development of Market Garage and the introduction of a residential development on the North Eastern side of Silk Mill works. In both instances, the reason for refusal included over-development of the respective sites and the dangers of access to Brook Street
- The plan proposals to create new food and drink leisure uses is difficult to understand when there are currently so many retail outlets available in Tring
- It states that any re-development of the site would only be permitted once replacement facilities are provided elsewhere in the town. The only specified new location is in Growth Area TR01 (Dunsley Farm) for the Fire and Rescue There is no detail with regard to the siting of Tring Market Auctions, nor the Local History Museum.
- One can create new buildings but one cannot create history

TR06 is not a redundant site, it forms and important part of Tring Town Centre with Tring Market Auctions and the local Museum providing both business and pleasure to hundreds of people throughout the year.

Included files

Title Question: Any other comment

ID EGS1649

Person ID 1262323

Full Name Emma Hilder

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Included files

Title Question: Any other comment

ID EGS1655

Person ID	1147853
Full Name	Geraldine Benson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I would like to propose that DBC withdraw the consultation, revise the proposals, and consult the public at a time and in a manner when the consultation can be fully inclusive, accessible and fair to all of our residents. Otherwise what is the point of democracy?
Included files	
Title	Question: Any other comment
ID	EGS1657
Person ID	1262328
Full Name	JILL GOSS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Firstly I would like to object to your timing for these planning proposals during this current pandemic. It is extremely problematic to travel to view sites plans and attend meeting in these extraordinary living conditions due to covid pandemic and restrictions. This will have greatly affected the way people can be contacted and difficulty especially for the elderly who are shielding and many who are not familiar with using a computer and are therefore unaware of these new planning developments. I feel that this is a crafty manoeuvre by Dacorum Borough Council! to pass this with little protest.
Included files	

Title	Question: Any other comment
ID	EGS1716
Person ID	223955
Full Name	Mrs Christine Widdows Doughty
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>INFLUENCE OF COVID-19 PANDEMIC</p> <p>The Covid-19 Pandemic has already had serious and disastrous consequences for health, life and the economy. Future effects/implications are unknown but surely need to be considered. It seems extremely short sighted to be pushing forward a Local Plan to cover Dacorum until 2038 based on pre-Covid-19 data and circumstances. To avoid a complete built-in obsolescence of the Local Plan, it would seem sensible/logical to delay even the consultation of the Local Plan, in order to reformulate it in light of the Covid-19 Pandemic and of the changes to the government algorithms used to project housing need (see 2.12 below). Continuing with the Local Plan in its current form feels like <i>'burying bad news'</i>, as people are so concentrated on the Covid-19 Pandemic that they don't have the emotional resources to properly scrutinise and challenge a complicated document such as the Local Plan.</p>
Included files	
Title	Question: Any other comment
ID	EGS1731
Person ID	1147853
Full Name	Geraldine Benson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	Very significantly, it also fails to take into account post-pandemic working practices. The advent of Covid has changed peoples lives in many ways and this should be incorporated into the strategy. It seems incredible that the many changes that Covid has brought to our lives have not been considered by this proposal at all.
Included files	
Title	Question: Any other comment
ID	EGS1739
Person ID	1261812
Full Name	Harvey Collyer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>am writing to lodge my objections to the Dacorum Local Plan. This is a seriously flawed and damaging proposal in many ways, some of which I will outline below.</p> <p>Basic Concept</p> <p>This plan is based on an alleged need to increase the housing count in the Borough by 25% involving an increase of 16,600 units. However, this appears to be based on ONS estimates for 2014 which have been later amended (in 2018) to only 500 per year – a very substantial reduction. This lower figure should be considered as the very maximum target.</p> <p>Green Belt</p> <p>The plan proposes the destruction of a very large amount (2,000 acres) of Green Belt and open land. This is totally unnecessary as the 500 additional units per year can be provided with careful use of brownfield sites, leaving the environment unaffected. The Vision uses the misleading idea that the construction of the proposed Hemel Garden Communities would deliver “green spaces”, but fails to explain that these “spaces” will be replacing open, truly green spaces. In short, the open land designated as Green Belt will be under concrete – it will not be any longer a “green space”.</p>

Road access

The Plan includes the construction of a road linking Junction 8 of the M1, via the Hemel Garden Communities to the B440, Leighton Buzzard Road. It notes that this will provide a replacement link to and from the M1 from places such as Berkhamsted and Tring. However, the road is not planned to go any further than the Leighton Buzzard Road. In short, it's a road leading to nowhere, as the onward links to other places are currently over used and inadequate. And that is as it is without this development. Channelling additional traffic away from the A414 would be an environmental disaster for the locations through which this extra volume is presumably expected to flow. Going via Potten End to Berkhamsted, for example, offers no route onward to the A41 that does not involve a weight restricted or low bridge, single carriageway, or progression through residential roads.

Public Transport

Current public transport provision in this area, especially near to the proposed development, is already best described as woeful. Bus routes and frequencies do not encourage their use. The Plan uses weasel words to suggest that there will be something, as the transport proposals are being developed. This is not good enough – a plan needs to be a coherent whole concept – not a piecemeal mish mash, with parts of it to emerge at some undefined later stage.

Water and Sewage

It is well known that water provision from the aquifer is already under pressure. In some places in the area, there is over extraction. The volume of additional housing is unsustainable in this context.

In a similar way, sewage treatment is already inadequately provided. In Potten End for example, Thames Water continues, as it has for years, to do nothing to stop raw sewage overflow into local gardens.

Thames Water is currently breaking regulations and discharges raw sewage into local chalk stream rivers, with very serious environmental and potential public health consequences. It has been doing this for quite some time.

Any document that proposes such a huge increase in housing in the area, must include a detailed plan on how the water and sewage provision will be safely and sustainably met.

Included files

Title	Question: Any other comment
ID	EGS1751
Person ID	211233
Full Name	Mr Andrew Bartley

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I wonder if this council had consulted with a group of people who have various abilities in the planning of such development? This is I believe a legal requirement under the Disability Act. A document called, Disability Equality Document (D.E.D.) is supposed to be produced and targets set with dates for proposed completion in achieving them by. This document is also to be made available to any member of the public on request and if cannot be available there and then a date given when, if this isn't available it is an offence and a court can order its production. Does DBC have such a document and would it be available on request? Is their a person with the portfolio for disability and housing?</p> <p>This issue must be included in any future development plans, and consultation with people who have a disability must carried out.</p> <p>My own living arrangements are difficult, I sleep in the sitting room and my wife is upstairs because the lack of a suitable two bedroom bungalow or maisonette.</p> <p>Please do not let us down!</p>
Included files	
Title	Question: Any other comment
ID	EGS1769
Person ID	406469
Full Name	Dr Stephen Douglas
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Too many houses, particularly in Tring and Berkhamsted
Included files	
Title	Question: Any other comment
ID	EGS1774
Person ID	1262371
Full Name	Patricia Harris
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	This is a terrible idea. We don't have the infrastructure. School places. Dr. Dentist roads. You are going to make Hertfordshire one whole town if this carries on. We have enough houses in this town now. Stop building on every little piece of land. It's making it unpleasant to be living here now. My family have been here since 1900.
Included files	
Title	Question: Any other comment
ID	EGS1825
Person ID	1262358
Full Name	Jennifer Scott
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS1849
Person ID	1262473
Full Name	Mr William Tannett
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>At risk of repetition, our already severely overcrowded Dacorum will be overwhelmed with so many new homes increasing the struggle with water resources, crowded roads, very busy hospitals and schools and other infrastructure.</p> <p>Our wonderful local Areas of Outstanding Natural Beauty and National Trust are already overcrowded and would suffer further damage from increased footfall.</p> <p>The pandemic has changed behaviours and these do not appear to have been taken into account.</p> <p>Surely such a huge proposed development, if proven, should be directed away from the south east in a northerly direction.</p>
Included files	
Title	Question: Any other comment
ID	EGS1855
Person ID	1262479
Full Name	Lyndsey Abercromby
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I've been trying to complete a submission on the website, but have been beaten by the technology. I consider myself literate in websites, but could not navigate the consultation website at ease, and trying to register to provide feedback generated a series of errors.
Included files	
Title	Question: Any other comment
ID	EGS1874
Person ID	1262495
Full Name	Jason Nell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Doubling the population of Tring will have significant impact on already overstressed transport, health, schools. This damage is irreversible and would change the the Town forever.
Included files	
Title	Question: Any other comment
ID	EGS1986
Person ID	1262709
Full Name	Adam Griffin
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I wish to object to the proposed development as I am very concerned about the local development plan that you have published and the various impacts it would have on the parish of Great Gaddesden. I would also question the timing of this at a time, given the current government imposed lockdown, when it is impossible to practically engage the wider community in any form of real discussion.
Included files	
Title	Question: Any other comment
ID	EGS2005
Person ID	1143683
Full Name	Mr Peter Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The main issue I have is with the requirement that Berkhamsted should absorb a c 30% increase in population over the plan period.</p> <p>There does not appear to be a really well thought out plan - with respect to the Council's officers - to ensure that the infrastructure can support this in terms of schools, water, green transport, central area parking for shoppers, medical resources, amenity / green spaces and similar supporting facilities.</p> <p>I do not see any emphasis on an enlightened local transport policy, i.e. providing environmentally friendly and sufficiently attractive public transport to dissuade people from using their vehicles for journeys to the town centre. The suggestion</p>

that enhanced pedestrian and cycling facilities will meet these needs is plainly ridiculous. Who in their right mind would be prepared to carry heavy shopping a mile uphill from the town centre to the new developments?

The inclusion of this sort of response to the problem indicates the underlying problem - the Borough do not have an adequate response to the pressure of central Government, other than to capitulate to their unreasonable requirements.

Included files

Title Question: Any other comment

ID EGS2017

Person ID 1262719

Full Name Richard Lythaby

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

To Whom it may concern,

Having found time to read the lengthily local plan, and supporting documents, and as a resident of Woodhall Farm for approx. 10 years, and Hemel Hempstead all of my life, I have the following responses to the plan.

Countryside

Throughout this plan you talk about the excellent green belt and the environment, with lots of green spaces.

You also talk about protecting the character of the countryside and later on that the countryside and other small villages will be protected from development.

However, when looking at the actual plans it seems to destroy over 850 hectares of countryside and green spaces, and have a dramatic and unnecessary impact on Green Belt. The consequences of the over-development proposed in the strategy is contrary to national policy, the Strategy's own policies, and both the Chilterns Conservation Board (CCB)

Management Plan 2019-24 and its Position Statement Development Affecting the Setting of the Chilterns AONB 2011, revised 2014.

Housing

The proposed level of housing is based on outdated 2014 population and housing data and overstates the housing need by around 50%, when compared to using more recent 2018 data. The proposed strategy prioritises meeting an excessive level of housing need over protection of the Green Belt on the assumption that this is required by a national policy. I don't believe these are exceptional circumstances where we need to have been belt released. The housing proposed to the north of Woodhall Farm, all be it protected until 2038, recently flooded, so I would like to see if anyone has carried out a recent flood risk survey on the farm land. With the covid-19 epidemic, it may also release more brownfield sites for development, as-well-as the Windfall completions that will occur from recently expanded permitted development rights.

Infrastructure

I do not believe the proposed strategy and those elsewhere in Hertfordshire and in neighbouring Buckinghamshire have been fully considered. During the Swallowdale/Spencers Park phase 1 development, of around 360 houses, there were concerns raised around Traffic and Schools. Surprisingly these would only be addressed with the phase 2 part of the project that hasn't happened yet and doesn't seem likely. In the plans, I believe there was a budget for around £250k from the developer, matched by the council or Herts Highways/Ringway for improvements to Three Cherry Trees, Swallowdale Lane and Redbourn Road. This seems to have now been superseded by a large trunk road connecting Green Lane to the A5, the north east relief road, again through farm land. The St Albans Submission Local Plan has recently been withdrawn from Examination as the Inspectors advised that it would not be found 'sound'. The proposed sites north of Hemel Hempstead in Dacorum must be called into question, along with the north east relief road.

During the building and occupation of the Swallowdale/Spencers Park phase 1 development, I looked for a new job based in the other direction (Milton Keynes) due to the impact on my journey to the M1 and M25(Maple Cross). I also note that the traffic surveys carried out were done so during half term, when lots of families wouldn't have been commuting to work.

Our schools around Woodhall Farm are full to the brim, with some families having to transport their children to schools on the other side of Hemel Hempstead.

The strategy is largely silent on new sources of water required to meet the demand from the proposed new developments and on the significant investment required to move and treat wastewater.

Downgrading of Hemel Hempstead A&E to urgent care meaning the nearest A&E's are Luton or Watford, large centres themselves.

There is no doubt that affordable new and redeveloped housing will be needed, however this should not be at the detriment of the countryside, or the area's near them. Woodhall Farm isn't really classed as in the countryside, but the countryside is very easily accessible. The large scale of this plan, almost obliterates the areas such as Woodhall Farm and Grovehill into North Hemel Hempstead.

Relieve the pressure on the existing infrastructure from the developments already compiled/underway.

Re-evaluate the browfield and windfall sites post-coved.

Regards,

Richard Lythaby

Included files

Title Question: Any other comment

ID EGS2038

Person ID 1262601

Full Name Anne Smith

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

- The consultation methodology has been extraordinarily poor.
- I only learnt about the consultation by accident.
- I did not receive a brochure. Planning advised me that they were aware of gaps but did not know exactly where the gaps were. Residents of New Road and Bridgewater Hill were some of the residents missed. How can the consultation be legitimate if residents close to one of the building proposals don't receive the brochure?
- Consultation during a pandemic is a very flawed process. How can we work as a neighbourhood in our response when we cannot communicate with our neighbours safely?
- Many neighbours may still not be acquainted with the local plan as a result
- The effect of Brexit alone cannot be predicted but layer on the pandemic and the future is hugely uncertain. A local plan for 18 years is meaningless and the Green Belt is at risk of being lost for reasons that are no longer relevant

- The local plan would benefit from being over a shorter term or even interim until the future is clearer
- Save our Green Belt

Included files

Title Question: Any other comment

ID EGS2039

Person ID 1262604

Full Name Ray Smith

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment The basic premis of this plan is flawed. There is no reason for growth on this scale except to increase revenue for Dacorum at the expense of local communities. An enormous amount of money has been spent to promise great outcomes that will not be delivered. DBC is supposed to serve the people of Dacorum, not the other way round.

Included files

Title Question: Any other comment

ID EGS2068

Person ID 1262738

Full Name Alan Pierce

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment	The entire framework for this review is based upon re-visitng housing targets which I believe are now out of date so far as Dacorum is concerned. The whole thinking of Central Government is to move infrastructure planning and employment opportunities further north in an effort to even out opportunities throughout England. This proposed Strategy does nothing to support that aspiration and should be abandoned
Included files	
Title	Question: Any other comment
ID	EGS2105
Person ID	1253932
Full Name	Gareth Scrivens
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Finally, I raise a concern regarding the way the consultation has been organised and the information made available to residents. Covid restrictions have prevented this information being available in suitable public spaces, and an extension for accepting comments of one month during lockdown restrictions is inadequate. Plans with such wide ranging impacts on a borough should be made available to all residents of the borough for due consideration.</p> <p>The online means of displaying the proposal documents is also not fit for purpose. Creating a 'virtual physical space' to browse documents is an incredibly poor and impenetrable user experience. Making information easily available in a web-browser, with better indexed and searchable information is a far more appropriate means of displaying vital information. I worry about the decision making that has gone on to spend time on this 'fake' physical display when better provision of information should have been considered.</p> <p>I trust that these objections will be duly noted and considered with all the other objections that I expect you to receive from across the borough. I urge you to reconsider the plans you're making with consideration of all the above points.</p>
Included files	
Title	Question: Any other comment
ID	EGS2123
Person ID	1262797

Full Name	NICK TURNER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS2135

Person ID	1262818
Full Name	MRS SUE COLLYER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I understand entirely the need for the Council to undertake long-term planning in order to meet the ever-changing needs of the area and applaud moves to open that process to views from the public and hope that due consideration will be taken of all the suggestions and opinions put forward.
Included files	
Title	Question: Any other comment
ID	EGS2174
Person ID	1261286
Full Name	John Saner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS2188

Person ID	1262762
Full Name	Eric Dodman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I would like to send this response to both my local councillor (Penny Hearn) and MP (Gagan Mohindra). Despite an election just over a year ago and the impacts of the COVID crisis he has not been visible to us in Tring. Furthermore, if this plan goes ahead unamended we will find it very hard to vote Conservative ever again. It is ill thought through with no visible supporting statistics behind it and shows no interest or concern in the existing communities in the small Market towns of the area. We think you have been bullied into this approach.
Included files	
Title	Question: Any other comment
ID	EGS2215
Person ID	1262765
Full Name	Paul Rees
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The profound scale of the climate and ecological crisis, requires radical new thinking. Simply building more and more homes, and more and more roads will do nothing to help humanity survive the growing catastrophe and will only make the crisis more extreme. Therefore, it is incumbent upon Dacorum to take this opportunity to break away from old patterns of thought - halve the number of new homes envisaged and look to drive human journeys away from roads and onto cycle paths, as well as onto footpaths.

Included files	
Title	Question: Any other comment
ID	EGS2235
Person ID	1262860
Full Name	Susanne Rees
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Dacorum promotes the laudable aims of promoting sustainability and biodiversity and yet in the current plans also says that it wants growth and new homes at a large scale, as well as new roads. Unfortunately, these aims are mutually exclusive. If Dacorum really wishes to promote sustainability and biodiversity, it must halve the number of envisaged new homes and commit to encouraging people to make more journeys on foot or by bike.
Included files	
Title	Question: Any other comment
ID	EGS2240
Person ID	1262755
Full Name	Karen Johnson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>Questions any other comments. The consultation for this plan is taking place at a totally inappropriate time. The world is struggling with the massive devastation caused by COVID and we are being expected to respond to a planning consultation which will affect people's lives for years to come. Most people are struggling to work whilst having to home school children and shield and support older relatives. Does the council not think people are struggling enough with out expecting them to respond to this consultation as well. It has taken me most of the day to complete this on top of an already stressful time dealing with everything else that is going on at the moment. Most of the town don't know what is going on with this plan and those that do haven't got time to deal with it appropriately. Perhaps that is the plan that all this development slips under the radar whilst people are busy dealing with the COVID side spin. The timing for this is a disgrace and as politicians I don't understand how you think it's appropriate with everything else that's going on to expect the public to engage with this consultation. We are on our knees. On top of that we have no idea at the moment of the change in our lives and how we work that has been brought on by COVID (people want space, gardens and rural locations yet you are insisting on building on our green space and ramming in loads of houses with no doubt tiny gardens). We have learnt that highly populated areas spread disease faster so do we really want to develop highly populated areas with no green space of any size. Along with the changes of less immigration from brexit which also haven't been considered. There is a strong undertone in this plan of developers wanting to build houses in areas where they know they will sell well and make a big profit. No regard for the towns and environments they are destroying. I'm am disappointed by the lack of support from all our councillors and MPs (despite their party loyalties) in preventing this dreadful proposal being pushed through. It's this sort of thoughtless money grabbing development that is damaging our environment irreparably and forever.</p>
Included files	
Title	Question: Any other comment
ID	EGS2279
Person ID	1262925
Full Name	Nandipha Jordan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The strategy for Berkhamsted and Tring relies too heavily on developing expensive two storey dwellings rather than more affordable higher storey properties on brownfield sites.

The reliance on speculative developers to carry out this work will do nothing to ensure the affordability of housing, the plan does not protect against the risk that property prices will be artificially inflated by developers banking land, and/or building properties which are unaffordable to people who work locally.

This plan will create housing but will destroy great swathes of countryside. Properties will not be affordable to people working locally and the developments will draw in new commuter residents. The plan will not solve the housing shortage experienced by local residents and workers.

The number of dwellings proposed exceeds that which is sustainable for the combined capacity of the market towns of Berkhamsted and Tring. The infrastructure of these two areas is interlined and interconnected. In terms of transport, their High Roads are linked by the main routes between the towns and the main arteries into the towns. They both also rely on the A41, the same train line and shopping facilities. There is no local hospital between the two towns. The two towns share the same bus routes. The delivery strategy takes no account of the combined pressure on the infrastructure which would be created by the combination of the proposed large house building projects in both Berkhamsted and Tring.

The main Berkhamsted developments are at the edge of town. As Berkhamsted is in a valley, most residents in those developments will need to use private passenger vehicles to travel into town and in order to connect with public transport hubs. The proposals in these locations are for family homes and retirement properties. It is not practical or realistic to expect families or elderly residents to travel by foot or bicycle from these developments. Furthermore, the routes into town and to the railway station from the proposed sites are through narrow residential roads with on-street parking. The proposed sites will cause immense congestion on those roads, increasing pollution and hazards to pedestrians.

In the case of Tring, the amount of housing and the potential area affected is very significant and includes the addition of 2,731 new houses, 1 new secondary school, 2 new primary schools, and associated retail, sport and industrial developments – almost doubling the size of the town. This equates to a 55% increase in houses for Tring, mostly on Green Belt land.

The proposed developments on the Green Belt, particularly in East Tring, are not connected with services or the town and will therefore have a considerable impact on the environment, air quality and GHG emissions.

Included files	
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Title	Question: Any other comment
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ID	EGS2306
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Person ID	1253589
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Full Name	Lucy Bennett
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Organisation Details	
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Agent ID	
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Agent Full Name	
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Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I am opposed to the building of new housing on green belt land, I understand that the formula used for calculating the number of houses to be built is flawed and that Dacorum should have changed its strategy when the government did so, . The number of houses proposed for Tring is far too high, it will put a huge strain on our small community and wastes essential farmland and acres of AONB in the chilterns. This level of building will overwhelm and irrevocably change the town of Tring for the worse. A large reduction to the proposed number of houses and using brownfield sites should be the chosen route. I do not think that Dacorum borough council has properly addressed the impact to the environment, infrastructure and climate change and biodiversity (particularly Chiltern Beechwoods SAC). I request that this strategy be urgently reviewed.
Included files	
Title	Question: Any other comment
ID	EGS2319
Person ID	610662
Full Name	Mr Antony Harbidge
Organisation Details	Chairman Berkhamsted Residents Action Group (BRAG)
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	BRAG is a member of the 'One Voice Alliance', a collection of organisations who, despite having different priorities, all share serious concerns and strong objections to the DBC Local Plan. We are all completely dismayed by the approach taken by Dacorum's Planning Officers and apparent endorsement by many of our local Councillors. The mission statement of the One Voice Alliance is: <i>'We, the Chiltern Society, Chiltern Countryside Group (CCG), Grove Fields Residents Association (GFRA), Berkhamsted Residents Action Group (BRAG), Kings Langley & District Residents Association (KL&DRA), Berkhamsted Citizens</i>

Association and Tring in Transition as the 'One Voice' Alliance, oppose the 'Dacorum Local Plan - Emerging Strategy for Growth' because:

- 1 Whilst the policy on biodiversity is clear, the emerging plan is not explicit enough in terms of **how** Dacorum Council will work with developers and other stakeholders to mitigate Green Belt loss, increase biodiversity and meet National and Hertfordshire's goals for climate change and carbon reduction
- 2 The proposed number of houses to be built should be significantly lower than the target to reflect **actual demonstrable need** for housing and the high proportion of Green Belt and AONB land in Dacorum, with a primary focus on affordable starter homes
- 3 A higher proportion of the houses should be built on brownfield land, or established through conversions, in the existing urban areas of Hemel Hempstead, Tring, Berkhamsted and Kings Langley, and **away from areas located in the Green Belt** (which should only be used in exceptional circumstances) and the Chilterns AONB and its setting.

While not members of the Alliance, the Chilterns Conservation Board and CPRE Hertfordshire are working closely as advisors to the One Voice alliance."

There may have been some foermating issues during the process of responding through this portal (particularly for the sites section), so to avoid any confusion and for accuracy a pdf of BRAG's official final response is attached.

Included files	BRAG 2021 submission to DBC Local Plan Consultation - FINAL.pdf (1)
Title	Question: Any other comment
ID	EGS2333
Person ID	1262984
Full Name	Deborah O'Sullivan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I am very concerned that amongst the wider Dacorum community there is a general lack of knowledge about the local plan and more importantly that the consultation period for it is about to close and as such people have missed the chance to comment on their future. I was under the impression that an awareness campaign was due to be in place but as a resident, I have received or seen nothing highlighting the consultation.

Additionally, I am very technically literate but have found the process of commenting very time-consuming and difficult. For most people without the time or means to comment this will drastically reduce the amount of feedback people will give which is not the same as people agreeing with the plans.

Due to Covid restrictions it has not be possible to engage and inform people with events such as:

- Door to Door canvassing of the local plan consultation
- Interested parties to meet and canvas at the various town markets

Covid restrictions have impacted

- Our ability to attend Council Meetings in person rather relying on access to online forums
- Residents being able to meet and consider responses to the local plan

The Government has asked all of us to restrict our interactions with the general public as it is both irresponsible and unlawful to do otherwise.

The council should extend this consultation by many more months, until the current crisis is over and an additional subsequent period be provide for the full engagement by all Dacorum residents.

I feel the strategy has failed to take account of a number of important issues or has diminished their significance, most importantly - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs. The pursuit of economic growth should be balanced against and not override environmental concerns and climate obligations.

Included files

Title Question: Any other comment

ID EGS2344

Person ID 1262697

Full Name Gillian Lindley

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Relating specifically to Tring, as the town seems to be bearing the brunt in percentage terms of the increase in housing numbers, we object strongly to this plan as we believe it will completely overwhelm Tring, put excessive strain on all aspects of our community and overload local services. We are particularly concerned that the additional traffic brought about by this huge percentage increases in the population of this lovely market town.

Emotionally, we consider that Tring, being sited as it is, an appendage to Dacorum, is often treated as an afterthought, for instance even in the Dacorum Digest it is hard to find the half page or so devoted to Tring.

These plans will destroy the Tring we love, it is not a case of NIMBY-ism, but in our opinion the plans for Tring are nonsensical and far in excess of both realistic needs and what the town can absorb.

We consider that the Plan is based on out of date figures for housing stock requirements.

We have been advised that 2014 projections for housing needs have been used, although the more up to date 2018 figures show a lower requirement, this by a significant amount.

Included files

Title Question: Any other comment

ID EGS2359

Person ID 1262244

Full Name Estelle Wraight

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment This consultation is very dishonest, as it leaves out people without internet access.

Included files

Title Question: Any other comment

ID EGS2396

Person ID 1254107

Full Name Polly Eaton

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>My overriding concern is of the construction methods, materials and infrastructure. With the government currently issuing green grants to have homes concerted from gas it is imperative that NO natural gas is used in these new builds. Air or ground source heat pumps should be used, as current available and recommended technology. Solar panels must be fitted to all properties. Other materials (wood, bricks etc) must be sustainably sourced.</p> <p>We are facing a climate emergency, and these proposals remove any responsibility from the developers, shift it to the new home owners and defer facing the issue for a few more years - which we do not have. The emergency is now. The development needs to be focussed on promoting walking and cycling and local community.</p> <p>Finally, there is a lack of considreation of biodiversity, wildlife and pollinators. These are not secondary elements to development but should be integral to the design.</p>
Included files	
Title	Question: Any other comment
ID	EGS2443
Person ID	1227518
Full Name	Mr John LOWRIE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	DacorumHemel

Included files	
Title	Question: Any other comment
ID	EGS2479
Person ID	1263080
Full Name	Russell Emson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy where upon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	

Title	Question: Any other comment
ID	EGS2487
Person ID	1153910
Full Name	DAGNA HORNER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	While the Local Plan document is attractive visually, I found it very hard to place the diagrams accurately onto the actual areas they describe, despite having lived in Hemel Hempstead and Berkhamsted for fifty years.
Included files	

Title	Question: Any other comment
ID	EGS2490
Person ID	1259206
Full Name	Greg Smith
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Given the covid pandemic and the current lockdown the traditional methods of communication with the residents regarding consultations such as this are not currently available. There are no physical displays in places such as town halls, libraries and council chambers for people with no internet access or facilities with computers to review these plans. As such many residents do not have a fair and equal opportunity to read this consultation or even be aware it exists.

I was not aware of this until a developer put leaflet in our mailbox one day and only then registered online which is necessary to receive any updates from the council. Thus the manner in which the council is conducting this consultation discriminates against the following groups of people:

- Residents who cannot afford computers and or access to the internet
- Elderly residents who either do not have computers or the skills to navigate the internet and this portal
- Residents with no computers who are currently shielding due to the pandemic and are not leaving their homes as per government advice

This consultation should be extended until the pandemic is over to ensure ALL residents are given an opportunity to review these plans, not just the wealthier residents with computers and internet access.

Included files

Title Question: Any other comment

ID EGS2512

Person ID 1263028

Full Name jennifer summerfield

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Recently there has been a proposal put forward to the residents of Bovingdon for a development off Louise Walk, Green Lane, Bovingdon. They are strongly emphasising the benefits to the community by building a scout hut, but this appears to be a rather opportunistic inducement to gather local support for the development. The proposal is inappropriate for the size of the site, its location and access point. Louise Walk is a single width cul de sac off Green Lane and next to the turning for the football/tennis club and any extra traffic would seriously impact Green Lane and the High Street. Cars are always parked along Green Lane when football is being played. The scout hut would benefit only a very small section of the community,

My husband and I do not approve of this proposal.

There should be no new developments built along Green Lane up as far as Bovingdon Green.

Included files

Title Question: Any other comment

ID EGS2644

Person ID 222269

Full Name Georgina Tregoning

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I believe that the proposed number of houses to be built should be significantly lower than the target to reflect **actual demonstrable need** for housing. With the new emphasis on levelling up to the north, and on using brownfield and urban sites, there is no need to build on so much Green Belt land in the borough.

Included files

Title Question: Any other comment

ID EGS2652

Person ID 1263231

Full Name Mr Phil Robinson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS2663
Person ID	1263235
Full Name	Mrs Vanessa Robinson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment

he Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS2674

Person ID 1161597

Full Name Stuart Mears

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS2683
Person ID	1263237
Full Name	Dr Alice Mears
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS2692
Person ID	1263240
Full Name	Stuart and Val Burnett
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

<p>QUESTION ANY OTHER COMMENT comment</p>	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
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Included files	
Title	Question: Any other comment
ID	EGS2702
Person ID	1263241
Full Name	Mr Stephen Hurley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS2713
Person ID	1263245
Full Name	Mr Paul Barritt
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy where upon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS2721
Person ID	1263247
Full Name	Giselle Okin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	By separating all the different sections for comment makes it incredibly difficult for average citizens to comment on an overwhelmingly complicated housing development plan. Most people in Berkhamsted have one overall comment to make which is that the housing development laid down across the areas is far in excess of what the area and infrastructure and geography of the area can cope with. Smarter people than me have read every detail of the plan and sought expert advice on the impact on wildlife and the raw data used to model the future housing needs in the area and I hope they are correct and that you listen to their advice. I can say that I know that simply the Bearoc Park development has already had a massive impact on the traffic on Shootersway to levels that are comparable to Central London on a busy day (where I used to live). The road is no longer safe for my kids to cross. I can't imagine what it's going to be like when thousands more houses are built just off this road. It's unthinkable. as a resident, it really doesn't look as though anyone in charge of the plans has any idea of the geography of the town. I implore you to think again and revise your plans to save the green belt, stop unnecessary pollution, maintain wildlife in the area and prevent bringing the town to gridlock.
Included files	
Title	Question: Any other comment
ID	EGS2782
Person ID	1263269
Full Name	Toni Egan-Perry
Organisation Details	n/a
Agent ID	1262871
Agent Full Name	Toni Egan-Perry
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I am writing to you to strongly oppose the building of the houses at the top of Bell Lane and Shooters Way. The people who will be living in these houses will be using Bell Lane which is a single track lane to drive into town. This road is already dangerous and too many drivers use this as a short cut to the town or local shops such as Tesco or Westfield store or taking children to school such as St Mary's. The traffic congestion along Granville and Westfield Road is already ridiculous, so much road rage and there was a bad accident this weekend, even in the evening. There is an important safety issue regarding transport and public safety trying to cross the roads. Therefore there is not the infrastructure of roads, schooling, health care such hospitals, social centre and leisure centres, the town is extremely congested every morning.

When I walk up Bell lane there are lots of wildlife that live in the trees and the field you are planning to build such as hedge hogs, bats and owls which are protected

Also there is a big push to plant more trees, you will be cutting down numerous trees, as per David Attenborough how can this be allowed.

This plan will have a negative impact on the carbon footprint, Greenhouse gas **emissions** from transportation primarily come from burning fossil fuel for our cars and trucks. My family and myself have asthma and breathing issues already how can more houses and more cars in Northchurch help the health of the residents of Northchurch.

What will the price range of these houses be? I imagine they will be extremely expensive and not even an option for our children to set down their roots, it will be for people moving out of London.

I do hope you review the plans and I look forward to hearing from you soon.

Yours sincerely

Toni Egan-Perry

Included files

Title Question: Any other comment

ID EGS2810

Person ID 1262479

Full Name Lyndsey Abercromby

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I've been trying to complete a submission on the website, but have been beaten by the technology. I consider myself literate in websites, but could not navigate the consultation website at ease, and trying to register to provide feedback generated a series of errors.

Included files

Title Question: Any other comment

ID	EGS2822
Person ID	1263287
Full Name	Jeremy Bonnar
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS2834

Person ID	1263206
Full Name	Andrew Farrow
Organisation Details	Great Gaddesden Parish Council
Agent ID	1253616
Agent Full Name	Andrew Farrow
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS2840
Person ID	1231875
Full Name	Mr Tim Pedder
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Dacorum is already an area of severe water stress. How is this issue being addressed with thousands of new homes proposed?</p> <p>The parking of vehicles in many new estates in the area is totally inadequate, (E.G Apsley Lock and Fourdrinier Drive) with pedestrians and wheelchairs being forced to use the the road in many cases. Is genuinely adequate parking being provided, especially taking into account the transition to electric vehicles in the coming decade? Will there be enough room for charging points for all the vehicles of the average 2 car family?</p>

Included files	
Title	Question: Any other comment
ID	EGS2844
Person ID	1263104
Full Name	charlotte grange
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>As with many other commenters here, I am fully against the huge scale of the proposed development, on account of sustainability, personal health and the health of our communities, and ecology. There have been continual mentions that biodiversity would be 'improved' through development - this is incredibly vague and not encouraging in the current time of climate disaster. Covid has taught us that our local countryside is more important than ever - I have personally seen huge increases in footfall in areas like Ashridge and other countryside areas that adjoin our towns - much of which would be destroyed under this current plan. The current plan fully runs against the Chilterns Conservation Board Management Plan 2019-24 and will see a huge increase in pollution from construction and personal vehicles, and will see the quiet country town nature of places like Tring and Berkhamsted entirely changed for the worse. Infrastructure will be massively strained beyond what it already is - and it will also likely affect our water supply. This will be taken from the Chiltern Aquifer, an incredibly important source for our chalk streams, an internationally unique and ecologically irreplaceable habitat.</p> <p>I appreciate that the net zero carbon emissions target of 2035 is mentioned, however I find it hard to see real evidence of actual adherence to this target with this emphasis on unsustainable growth. I would like to see renewable energy solutions be brought to the forefront, and instead of proposing vast areas of urban settlement far to the excess of actual population growth figures from the ONS, I would like to see a renewed invigoration of the countryside, with the creation of more protected areas, and tree planting and meadow creation schemes. The relationship between residents and the surrounding environment is an important one which was strengthened during the lockdown as we looked to the fields beyond our houses for an escape from our homes. The countryside around Hemel is a hugely important resource for local residents, and to take this away is an ill thought out and incredibly sad outcome for Dacorum.</p>

This may be an out of the blue point but I would also like to comment on the accessibility of this website itself: I'm a young person and still found it hard to work out! If this site was a little more clear and accessible, and less of a maze to navigate, I feel we could have had more people here have their say.

Included files

Title Question: Any other comment

ID EGS2850

Person ID 1263198

Full Name Jillian Hipson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The consultation has taken place while the entire country was in lockdown during the winter. Many people in Berkhamsted and Northchurch have no idea about the Local Plan or what it means for our town. Other people have been fully occupied with trying to home-school their children and trying to work from home. They have no spare time to look at the complexity of what is being planned.

Please stop the consultation, do your sums again, and consult again when the country is back to normal in the summer.

Included files

Title Question: Any other comment

ID EGS2861

Person ID 1263400

Full Name Edwin blenkinsopp

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>the structure of the consultation is extremely user unfreindly and mitigates against the public ability to make comment, the system is completly biased to developers</p> <p>the development plan is overblown to maximise porr quality high profit structures and takes no apperent account of quality of life for the unfortunate future occupiers. high sounding principles result in the majority of people suffering fines for parking and traffic regulation because of inadequate development of infrastructure and too dense population.</p> <p>unsociable elements of society are encoraged by these dense structures and unless the planning committe members would be happy to exchange their current abode for one of these including the traveller provision it is without any merit to impose that on the less fortunate.</p>
Included files	
Title	Question: Any other comment
ID	EGS2862
Person ID	1263407
Full Name	Hannah Dormer-Boltob
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>As a resident of Granville road I am concern that it is already a rat run for cars trying to avoid the already busy Northchurch high street, racing along to drop kids off at all the schools, the social centres activities, church nights activities. The proposals for Darrs and Durrents Lane are not sufficient to cope with the amount of new traffic from the new housing wanting to access the town and Northchurch Tesco . I have already witnessed a head on collision outside my house from cars that do not have enough room. It is unacceptable to put the risk of more accidents and road rage outside our houses. Especially when so many children walk this route and cross these roads for school. Plus the almost certainty of damaged cars from those trying to reverse back and squeeze past etc.</p>

Included files	
Title	Question: Any other comment
ID	EGS2921
Person ID	1263377
Full Name	Jane Messenger
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The scale of the proposed development is huge. How have the council calculated that we need 16,000 + new homes. where are all these people coming from? Whilst i accept that we need new homes and need to grow and develop i cannot see why all this has to be in and around Hemel Hempstead.
Included files	
Title	Question: Any other comment
ID	EGS2956
Person ID	1263440
Full Name	J Davies
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No

QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS2961
Person ID	1263439
Full Name	Rod Gibberd
Organisation Details	Tring School
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> • Currently Tring School secondary places are being squeezed and, under the distance ruling in the Admissions Policy, children who live in outlying villages, who have traditionally had a place at Tring School, will struggle to obtain a place in the near future. • Tring School is oversubscribed by two and a half applications for every one place. • Tring School is part of the RLP and we are well-placed to manage the potential expansion of primary and secondary provision in the town. • RLP would be very interested in expanding the primary and secondary provision. • RLP will be keen to engage in sustainable schools to keep the carbon footprint low. • RLP will be very interested in delivering the expanded sports provision for the town. It would make sense to put all of the sport together and run it under Tring Sport and Leisure Limited. • Tring School is currently in the midst of constructing a new “state of the art” school in the centre of the existing campus. This development is part of the DfE PSPB2 programme and is valued at approximately £30m which includes a substantial contribution from the school to enhance pastoral and leisure facilities. We believe that the experience and knowledge gained from our significant contribution to the design and efficiency of the buildings will make us excellent partners for the new school developments included in the DBC proposals.

- Tring School and the Ridgeway Learning Partnership also operate the wholly owned trading subsidiary, Tring Sport and Leisure Limited. TSLI worked closely with DBC in refurbishing the swimming pool and since taking the facilities over in 2019 has demonstrated a strong understanding of the leisure marketplace and has significantly expanded the offering beyond the swimming pool and astroturf pitch. In early 2021 a new 4 court sports hall will be available for community use as well as a modern activity studio. If/when a new sports hub is to be developed in Tring we believe that it should be under a single management in order to offer broad and cohesive leisure with ALL profits being reinvested for the benefit of the children and the further enhancement of the leisure offering.

Included files

Title Question: Any other comment

ID EGS2977

Person ID 1164709

Full Name Dianne Pilkington

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

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land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

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Included files

Title Question: Any other comment

ID EGS3018

Person ID 1258924

Full Name Natalia Maghdoori

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS3019

Person ID 1262892

Full Name Jean Farrer

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Several organisations have come together as One Voice to present the views of Dacorum residents, especially in relation to Berkhamsted, Northchurch and Tring. I support their detailed submissions regarding the Local Plan. They have analyzed the Plan in a way which individual residents are quite unable to do in the main.

These include BRAG, Grovfields, CPRE, The Chiltern Society etc.

I have added my comments as emphasis to what they have already provided.

I still object to the consultation process going ahead in the pandemic lockdown. I believe the Government would understand that this is unreasonable given the problems residents are experiencing in other areas of their lives. We are all stressed

and may also be bereaved, worried about vulnerable family members, worried about health, money, employment, home schooling, suffering from isolation and mental health problems.

I wrote to the Strategic Planning department early on and was advised that it was important to get our Plan submitted to prevent speculative developers having the upper hand. I suggest that the Government would be prepared to negotiate about timescales for the Local Plan given the extraordinary difficulties both staff and residents have had to engage properly in this task.

Many residents are still unaware of the Local Plan and how it will affect their quality of life. I did not receive the brochure publicising the consultation process which, in any case, was sent out very late in the extension of the process. Many of my neighbours are in the same position and have limited access to computers and sufficient knowledge to participate. The form and the portal actually are not synchronised and I suddenly found so many more issues to comment on.

I fully appreciate that planning authorities have to plan ahead and can't wait for all the information about changing circumstances to be available. However, I would argue that a pandemic of this scale is life changing and we have never experienced this kind of situation in peacetime before. For this reason, I think we DO need to pause and take account of the long term effects of the pandemic to where people live and work.

The Government's stated policy is to level up the North and South divide through major investment and development in the North of England. The reduction in the population in London is already hollowing out the demands for development there and this must also be reflected in the commuter belt shires like Hertfordshire. When families can get pleasant 4 bedroom houses with a decent garden for affordable sums (£230k), why would they want to pay £800k for an executive home on a postage stamp plot in Berkhamsted?

Robert Jenrick has already signalled his serious intention to move major developments North through a section of his department moving to Wolverhampton. This is encouraging and should indicate to Hertfordshire that the pressure on our densely populated towns can be relieved to some extent.

Please can Borough Council take this on board in its revision of the Local Plan?

Included files

Title Question: Any other comment

ID EGS3027

Person ID 1263491

Full Name Peter Roberts

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The local plan as presented is difficult to follow as the use of different zoom properties on the various documents and plans.</p> <p>The maps need more roads, not just A-roads. It is via the smaller roads that people can see where the new developments are.</p>
Included files	
Title	Question: Any other comment
ID	EGS3042
Person ID	1261425
Full Name	Camilla Pascucci
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>1 The timing of this consultation during a worldwide pandemic and national lockdown has disenfranchised the public. In particular, not allowing full access to the many people who do not have internet access. The DLP document is too large to access and navigate on mobile devices, which is what the majority of the public will be using to</p> <p>The only other available option is to make an appointment to visit the library to see the documents. However, our government has told the public to 'Stay at Home to Save Lives'. Few will choose to risk their lives by booking in to view the DLP at the library.</p>
Included files	
Title	Question: Any other comment
ID	EGS3072
Person ID	1146084

Full Name	Mr Jason Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am very concerned that amongst the wider Dacorum community there is a general lack of knowledge about the local plan and more importantly that the consultation period for it is about to close and as such people have missed the chance to comment on their future.</p> <p>Due to Covid restrictions it has not be possible to engage and inform people with events such as:</p> <ul style="list-style-type: none"> • Door to Door canvassing of the local plan consultation • Interested parties to meet and canvas at the various town markets <p>Covid restrictions have impacted</p> <ul style="list-style-type: none"> • Our ability to attend Council Meetings in person rather relying on access to online forums • Residents being able to meet and consider responses to the local plan <p>The Government has asked all of us to restrict our interactions with the general public as it is both irresponsible and unlawful to do otherwise.</p> <p>The council should extend this consultation by many more months, until the current crisis is over and an additional subsequent period be provide for the full engagement by all Dacorum residents.</p> <p>I feel the strategy has failed to take account of a number of important issues or has diminished their significance, most importantly - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs. The pursuit of economic growth should be balanced against and not override environmental concerns and climate obligations.</p>
Included files	

Title	Question: Any other comment
ID	EGS3106
Person ID	1263499
Full Name	Mrs Angela Burgin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>

Included files	
Title	Question: Any other comment
ID	EGS3128
Person ID	1263514
Full Name	SAM LETHEREN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein</p>

for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS3150

Person ID 1263526

Full Name MR NICK RIPPER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS3153

Person ID 488516

Full Name mr hugh siegle

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

It will be clear from my responses that I am opposed to the draft Plan, but I would also like to express my disappointment on a number of counts:

That the Council have made no attempt to challenge what they believe to be Central Government's assessment of housing need in the Borough

That at a time when the Country is undergoing a major upheaval the Council was not prepared to pause the process of consultation which would have given further opportunity to assess the real needs of the Borough but also avoid disenfranchising many residents who cannot or are reluctant to access the internet for such matters

That it is very difficult to fully absorb all the documentation accompanying the consultation document which is an extensive document on its own right

The likely cost to ratepayers of producing the draft Plan including the employment of a lot of consultants

Overall that while many draft policies maybe worthwhile the growth targets being promoted directly conflict with these policies

Included files

Title	Question: Any other comment
ID	EGS3173
Person ID	1263537
Full Name	MRS SARAH RIPPER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>

Included files	
Title	Question: Any other comment
ID	EGS3189
Person ID	1263550
Full Name	ANNABEL FRANCIS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein</p>

for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS3236

Person ID 1144598

Full Name Mr Julian Dent

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Failing to change the DBC Local Plan to take account of these objections, will render many consequent planning actions to be open to judicial review, delaying action, incurring huge cost and generally wasting time, money and effort that DBC can ill afford. The strength of local option and the weight of objections should cause DBC to pause, reconsider and update its plan based on up-to-date and more relevant data. DBC should listen to its residents and push back on the Government's housing targets for our area, making the legally valid case that these targets are based on the wrong data.

Included files

Title Question: Any other comment

ID EGS3249

Person ID 1263566

Full Name Frances Read

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS3259
Person ID	1155396
Full Name	Jane Hodgson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density</p>

opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS3295

Person ID 1263610

Full Name BRYN HENRY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS3296

Person ID 1263610

Full Name BRYN HENRY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS3308

Person ID 1263620

Full Name EMMA SIMMONDS

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS3309

Person ID 1263620

Full Name EMMA SIMMONDS

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS3322

Person ID 1263631

Full Name GAVIN NICHOL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS3324

Person ID 1263631

Full Name GAVIN NICHOL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS3336

Person ID 1263643

Full Name IAN DESTE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS3338

Person ID 1263643

Full Name IAN DESTE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an

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Included files

Title Question: Any other comment

ID EGS3374

Person ID 1263652

Full Name Andrew Lunn

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Overall the plan is going have significant impact upon the lcoal community and leisure options. Berkhamsted football team is going to severally affected witht heir proposed move.

The whole plan smacks of trying to ruin the beautiful and historic towns of Berkhamsted and Tring, without any consideration given to existing residents and their surrounding. Berkhamsted does not need an extra 2500 housing units. The area on which the proposal are being built are greenbelt land which provides natural beauty.

I oppose the proposal complete it will ruin the whole community and have a negative impact upon house prices etc.

Included files

Title Question: Any other comment

ID EGS3392

Person ID 1263726

Full Name Andrew Gifford

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

With encroachment on greenfield and natural floor plan sites I struggle to see the consideration for protecting and conserving the natural environment. The UK is the highest deforested country in Europe with only 17% this goes against this and the climate change manifesto. Impacting natural animal routes and quiet protected spaces only forces greater impact on the local wildlife and with sizable projects and lack of infrastructure and services this worsens already congested areas and "rat routes". Looking to BareRock Berkhamsted this has already impacted school places as well as congestion in the small local community of Northchurch and further development of the size is not fit and merges localised lines and boundaries. Roads, infrastructure, medical care, hospital facilities are all at breaking point and adding a further unstructured adhoc sites compounds this. Although there are considerations to the plan an approach such as Thakams is far more thought out, combined and addresses key considerations on flood planes and overall impact.

Current rate do not support businesses in the Berkhamsted community, infrastructure and services are poor or poorly maintained and the plan is both outdated and ill consulted. As example this closes 28/02 and the first correspondence received was 24/02.

Included files

Title	Question: Any other comment
ID	EGS3454
Person ID	1263124
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p><i>We appreciate that all Local Councils are struggling to balance what has been decreasing income and increased demand for services over recent years (although this may in the future be partially mitigated by the increased housing numbers). So, planning for sustainable development of new sporting facilities and working in partnership with third sector partners (such as DSN and sports' NGBs) becomes essential, as this can provide access to additional funding, and partners who can undertake facility development and management at little or no cost to the Council; and especially if planning strategy enables such facilities to be planned and developed in sustainable formats (especially in larger concentrated units, such as hubs and multi-sport venues) that can be managed by the community, including by well-established clubs.</i></p> <p><i>DSN are uniquely placed to understand local sporting needs, the opportunities for development of new facilities; and the ability to bring together local partners (including clubs, other community and charitable organisation and potential new funding contributors) to help facilitate development and or management of such new facilities.</i></p>
Included files	
Title	Question: Any other comment
ID	EGS3479
Person ID	1260178
Full Name	Sally Klinkenborg
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>As trees are the lungs of our planet and we are in the midst of an environmental crisis, I am very concerned about the preservation of trees and countryside. Farmland needs to be preserved as this will affect people's livelihood.</p> <p>Also, a town like Tring, where I have lived for over 40 years, does not have the infrastructure to support a large increase in housing and so there are concerns about the impact on residents and the surrounding countryside regarding the building of more shops, garages, GP surgeries, etc.</p> <p>Whilst I appreciate the need for more housing, I feel that this must be done in a measured and considerate way, taking the environment into account.</p>
Included files	
Title	Question: Any other comment
ID	EGS3489
Person ID	1263805
Full Name	Andrew Criddle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p><i>For Tring, the difference between this plan being unacceptable as it is currently, and being acceptable as it could be is:</i></p> <ul style="list-style-type: none"> <i>Reducing the numbers of new housing to no more than 500-750</i> <i>Incorporating a significant improvement in infrastructure especially facilitating significant expansion of existing sporting facilities and playing pitch space</i> <i>Developing primarily the Dunsley Farm Tr01 site as a mixed use economic and housing site but combined with around half the site given over to new sporting facilities – and the addition of a school (if required) adjacent to the new sports playing space.</i> <i>As well as developing the TR01 site as above – development could be acceptable in Tr02, Tr04 and Tr05 if essential and supported by appropriate additional infrastructure development.</i>

For Dacorum as a whole, I am concerned that with the vast expansion of housing/population in Aylesbury Vale close to Dacorum (in Aston Clinton, Halton and Weston Turville) when combined with the increases in the West of Dacorum (HGC, Berkhamsted and Tring) there will be immense pressure on the local infrastructure in both Boroughs. I am especially concerned that there is no accompanying plan for increased hospital capacity in either Borough (indeed a downsizing is proposed for Hemel Hospital). Stoke Mandeville Hospital which services the needs for most in Tring is already stretched and we may find its services no longer available to residents of Dacorum as a result of the development around Aylesbury straining its resources. I consider therefore that additional hospital resources are a critical infrastructure priority.

Included files

Title Question: Any other comment

ID EGS3527

Person ID 1263824

Full Name Nichola Criddle

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

For Tring, the difference between this plan being unacceptable as it is currently, and being acceptable as it could be is:

- Reducing the numbers of new housing to no more than 500-750*
- Incorporating a significant improvement in infrastructure especially facilitating significant expansion of existing sporting facilities and playing pitch space*
- Developing primarily the Dunsley Farm Tr01 site as a mixed use economic and housing site but combined with around half the site given over to new sporting facilities – and the addition of a school (if required) adjacent to the new sports playing space.*
- As well as developing the TR01 site as above – development could be acceptable in Tr02, Tr04 and Tr05 if essential and supported by appropriate additional infrastructure development.*

For Dacorum as a whole, I am concerned that with the vast expansion of housing/population in Aylesbury Vale close to Dacorum (in Aston Clinton, Halton and Weston Turville) when combined with the increases in the West of Dacorum (HGC, Berkhamsted and Tring) there will be immense pressure on the local infrastructure in both Boroughs. I am especially concerned that there is no accompanying plan for increased hospital capacity in either Borough (indeed a downsizing is proposed for Hemel Hospital). Stoke Mandeville Hospital which services the needs for most in Tring is already stretched

and we may find its services no longer available to residents of Dacorum as a result of the development around Aylesbury straining its resources. I consider therefore that additional hospital resources are a critical infrastructure priority.

Included files

Title Question: Any other comment

ID EGS3553

Person ID 1263810

Full Name David Tolfree

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Tring & Berkhamsted offer a Market Town feel in look and community. I think number of potential houses to be built in these locations is far too high, especially in Tring.

Included files

Title Question: Any other comment

ID EGS3567

Person ID 1263797

Full Name Chloe Collins

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Tring Rural Parish Council welcome the opportunity to contribute to Dacorum's New Draft Local Plan and Emerging Strategy for Growth 2020-2038. (The Plan)

We are encouraged that the proposed policies maintain and support the current Settlement Hierarchy with specific policies for Rural Areas and continue to recognise that the countryside in Dacorum is the least sustainable location for major new development in the borough and therefore will remain an area of development restraint.

We are however extremely concerned that the Sustainability Appraisal suggests that if the proposed release of Greenbelt land for growth fails, for whatever reason, a fallback position of major development abutting Long Marston could be applied. TRPC would not support this option.

We note with interest that The Plan considers Neighbourhood Development Plans will play an increasingly important role in shaping growth in Dacorum's rural areas in the future. Tring Rural Parish Council will give serious consideration to producing an NDP or site-specific Community Right to Build Order/s (Localism Act 2011). We believe that Neighbourhood Development Orders, Village Design Statements, Assets of Community Value and Parish Plans should be encouraged in parishes, thereby ensuring that future development in rural communities is appropriate to the location and encourages sustainability.

Waste Management

Dacorum declared a Climate Emergency in July 2019 and have committed to reducing carbon emissions across Council activities to net zero by 2030. The declaration also places key responsibilities on the Local Plan to include all available measures to cut carbon emissions and reduce the impact on the environment.

The Plan goes on to say that the impacts of growth will be reduced through: the prudent use of natural resources; encouraging renewable energy production; the effective recycling of waste; the sustainable design of new development and careful land management.

Tring Rural PC would strongly advocate and support a Service Level Agreement between Dacorum Borough Council and Buckinghamshire Council agreeing a cross-boundary partnership to allow residents of the parish to utilize the facilities of the Household Recycling Centre at Aston Clinton, a distance from the Parish boundary of approximately 1 mile.

This would concur with and support the following;

- Hertfordshire Waste Management Development Framework 2011 – 2026
- Dacorum Sustainable Waste Development
- Dacorum Recycling Carbon Footprint
- Dacorum Cross Boundary Working

Currently residents of the parish use the nearest Borough Household Waste and Recycling Centre in Berkhamsted, a round journey in excess of 20 miles.

To achieve this, we would draw attention to **Buckinghamshire Council Household Recycling Centre’s Waste (HRC’s) Access and Acceptance Policy (WAAP)** 1st August 2020 detailing permitted users of their sites and clarifies access for Non-Buckinghamshire households.

- The WAAP identifies by map, a 7-mile radius catchment area (which includes Tring Rural Parish)
- Policy A5 recognises that in most cases residents will use HRCs that are closest to their household, hence there will be some cross-border use of HRCs.
- Policy A5.2 affirms that the Council may set up Service Level Agreements (SLA) with neighbouring authorities for cross-border access to ensure the costs of provision of the HRC are shared fairly.

Included files

Title Question: Any other comment

ID EGS3571

Person ID 1263821

Full Name Anne Isherwood

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS3572
Person ID	1261821
Full Name	Chris Cole
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The Plan lacks ambition. It relies on the doling out of lumps of housing growth with no thought to the impact on the quality of life of existing residents and the long term health of the communities affected. Adding growth on growth in the same places results in destruction of the locations targeted. A more visionary approach would prioritise the development of new centres of housing, employment and infrastructure.
Included files	
Title	Question: Any other comment
ID	EGS3624
Person ID	1263865
Full Name	Robin McMorran
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I've never read such a load of flapdoodle eyewash in my life. All that overloaded management-ese trying to justify concreting over acres of green belt land with meaningless references to "biodiversity" and "sustainability". This is Newspeak - Orwell foresaw this. The Tory government has brought this about to cope with a growing population - even though the atrocious Tory Brexit was promised to bring it all under control by closing the country's borders. Maybe it's time to start hadning out free contraceptives? The people won't forget who did this to the country - as the bulldozers start rolling across the bucolic idyll, any Tory councillor had better have their CV up to date. Clear your desks.
Included files	
Title	Question: Any other comment
ID	EGS3628
Person ID	369415
Full Name	Mr Dacorum EnvironmentalForum
Organisation Details	Chair Dacorum Environmental Forum Waste Group
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Dacorum Environmental Forum (DEF) welcomes the considerable effort put into to drafting a detailed plan, and applauds the emphasis given to combating climate change, enhancement of biodiversity and preserving the unique character of the countryside and the built environment. However, DEF has grave concerns about the general outline and details:</p> <p>(Number references are to the numbered sections in the following "Detailed Comments" section.)</p> <ul style="list-style-type: none"> • In significant areas it is, in its current form, not fit for purpose as a public consultation document, because: • The plan refers to various Supplementary Planning Documents, Action Plans, and Site Allocations that are still in the process of being formulated. The public should not be consulted until these documents are included in the (1, 12, 15, 22)

- The plan includes details of site developments for which planning permission has already been given, but the details given by the developers in order to secure that permission do not comply with the criteria laid out in this draft NLP **(1, 7)**
- The documents and algorithms used to calculate Local Housing Need are out of date, and likely to be revised, so the public are asked to comment on proposals that are no longer justified. **(25)**
- DEF has sight of a letter from Christopher Pincher MP to Cllr. Andrew Williams that Councils do indeed have “wriggle room” adopt lower housing numbers, but DBC do not seem to have availed themselves of this option, or shown any intention to do so. To quote “Authorities should make a realistic assessment of the **number of homes their communities need** as the starting point in the Once this has been established, planning to meet that need will require consideration of land availability and relevant constraints such as **Green Belt**. It is expected that where the need cannot be met through **brownfield land and land in sustainable locations near to transport interchanges then the authority should seek opportunities within neighbouring areas.**” The public should not be consulted until DBC has explored this option, particularly as Cllr Williams has already raised the issue that the housing numbers are too high for this Borough.
- At the adoption of the Draft plan in November 2020, it was agreed that there would be a list of all nature reserves, local wildlife sites and SSSIs, but this does not appear to have been added. There are references in the plan to enhancements to wildlife sites that are not specified by precise locations on a **(8)**
- The DEF submit that even under the criteria of the now outdated algorithm the **total of new dwellings needed by 2036 is grossly over-estimated**, and has not been informed by the guidelines in the NPPF for taking into account local constraints, in particular the Green Belt. **(24, 25)**
 - The plan fails to take into consideration the overwhelming public opinion, and also recommendations by Government-appointed Inspectors, to **retain the Green Belt**. **(26)**
 - DEF is particularly opposed to the Hemel Garden Communities and the developments in North Hemel. In particular, the development on the West side, from Piccotts End to Lovetts End would be a tragic loss of visual and recreational amenity, especially when viewed from North Gadebridge (Halsey Field), and when walking /running from Grove Hill to Gaddesden Row. **(5)**
 - While there are many positive features in the plan, particularly in regard to enhancing biodiversity, reducing carbon emissions, and preserving the visual amenities of the countryside, these are largely **aspirational rather than mandatory**, or fail to recommend the immediate adoption of current technology. In significant ways **major proposals in the plan are directly contrary to these (2, 3, 4, 11, 13, 14, 16, 17, 20, 21)**

We note that HM Government are bringing forward proposals that will require all new builds to be **carbon neutral by 2025**

Quote “The government has set out its plans and timeframe for its new Future Homes Standard which aims to 'radically improve' the energy performance of new homes, making them 'zero carbon ready' by 2025” (Architects Journal 20th January 2021) In the light of these proposals, the NLP must have **much stricter criteria** for planning consent, which must be **adopted at a much earlier deadline**

- The consultation is taking place at a time when we move beyond Brexit and the Covid pandemic, and there is likely to be a societal change in the geographical demands for housing, retail, commercial and industrial **This will render the proposals incompatible with the new conditions of “The New Normal”** Consequently the most contentious and undesirable site allocations should be deleted from the current plan.
- Currently, since the demise of the printed version of “Dacorum Digest” the plan has not been widely advertised to residents, and the local paper is not now widely purchased. Consequently many residents are unaware of the proposals or the consultation, and some residents do not have access to facilities for completing the consultation on line, and libraries are inaccessible due to Covid restrictions. **The deadline for consultation should be postponed** until
 - 1 after the plan has been more widely advertised, and
 - 2 after lockdown has been lifted sufficiently to enable residents to access paper copies and to be able to consult between themselves independently of social media, and
 - 3 the omitted documents referred to below have been
- The plan deals specifically with designating the future use of most of the land in the Borough, **but has little vision for the cultural and social development of the Borough.** With the likely contraction of the retail sector of the economy, and the absence of a focal Arts and Entertainment centre, the future of Marlowes pedestrianised area is bleak, and more creative and imaginative proposals need to be put DBC seem to have reneged on their promise to encourage a “Leisure Quarter” to be built on the former Market Square and bus station. **(6)**
- The local chalk streams are of recognised global ecological importance, but there are no proposals to ameliorate the deleterious effect that extra housing will have on the streams, due to increased abstraction of water from local Furthermore, there are no proposals to improve the water quality by rectifying the pollution from existing storm drains and culverts. **(27)**

- DEF have identified the following clauses and policies in support of these grave concerns; additional concerns are also included in these details. **(8, 9, 10, 20, 23)**

For our full response see:

The attached document if you are receiving this by E-mail

The link below if you are viewing this online

<http://dacenvforum.org.uk/> and look under "Consultations etc."

Included files

Title Question: Any other comment

ID EGS3640

Person ID 1263885

Full Name Mr Neil Roberts

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS3647

Person ID 1145631

Full Name Mr Alastair Greene

Organisation Details Clerk
Little Gaddesden Parish Council

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTION ANY OTHER COMMENT comment

Included files

Title Question: Any other comment

ID EGS3688

Person ID 1257698

Full Name Peter Block

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Bulbourne Cross proposals are not included in the local plan, and nor should they be. The company peddling the idea has done massive leafletting in Berkamsted with beguiling images; they are charletons with an eye for the main chance. If their ideas were followed, Bourne End would merge with Berkhamsted and produce yet another sprall.</p> <p>We have to expect and plan for increased use of cars as in most cases they are the most convenient way of getting from A to B in Berkhamsted.</p> <p>There will always be limited opportunities for cycling unless you are on the level; cycling to shop is not very practicable; cycling on the A4251 can be hair-raising for both cyclist and driver, and often most frustrating when attempting to overtake .</p> <p>CPRE report a lot of green field sites elsewhere. Government policy is to encourage development in the North of England; excessive growth in the South (including Berkhamsted) only serves to thwart its desire.</p> <p>I thought I was reasonably intelligent, but I will have to revise my self-perceptions; this consultation has been thoroughly perplexing.</p>
Included files	
Title	Question: Any other comment
ID	EGS3700
Person ID	1263936
Full Name	NICK GOSS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	Firstly I would like to object to your timing for these planning proposals during this current pandemic. It is extremely problematic to travel to view sites plans and attend meeting in these extraordinary living conditions due to covid pandemic and restrictions. This will have greatly affected the way people can be contacted and difficulty especially for the elderly who are shielding and many who are not familiar with using a computer and are therefore unaware of these new planning developments. I feel that this is a crafty manoeuvre by Dacorum Borough Council! to pass this with little protest.
Included files	
Title	Question: Any other comment
ID	EGS3748
Person ID	1263908
Full Name	Thomas Burger
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Berkhamsted is busy enough without adding 2200 new homes. This is an outdated survey and does not take into the effects of Brexit and Covid. Destroying the precious green that makes this area so attractive would not only be an environmental disaster but a logistical one too, there is no way the trains could cope, they are busy enough during the rush hour without adding a minimum of 2200 new people using it. The high street is also very busy and although its suggested another Highstreet will be created it will almost certainly create an influx of people to Berkhamsted. Finally the A41 is very busy during peak times, how do you expect it to cope with 2200 new people driving up and down it?
Included files	
Title	Question: Any other comment
ID	EGS3769
Person ID	1263921
Full Name	sarah diehl
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS3787
Person ID	1263939
Full Name	Mr Richard Dawkins
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>It is important to comment on a proposal by Thakeham to create Bulbourne Cross (Footnote 56 – https://www.bulbournecross.co.uk). While this area does not currently feature in the draft local plan, the developer is arguing for its inclusion in place of other Berkhamsted developments.</p> <p>It would be a serious misjudgement to add this site to the Draft Local Plan as all the arguments in section 1-3, 6, 7 and 8 in the response to question 5 apply but their impacts are even more extreme given this site would provide over 20 times the number homes of Bank Mill Lane or 22% more homes than Bank Mill Lane and the area south of Berkhamsted combined.</p> <p>Critically, this proposal would join Berkhamsted with Bourne End in contravention to section 13 of the NFFP which stipulates two of the purposes of the Green Belt as being a) to check the unrestricted sprawl of large built-up areas; and b) to prevent neighbouring towns merging into one another (Footnote 57 https://www.gov.uk/government/publications/national-planning-policy-framework--2 : para 134, pg 40).</p> <p>This proposal should be rejected.</p>

Included files	
Title	Question: Any other comment
ID	EGS3807
Person ID	1263887
Full Name	Atherton Powell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I think the plan misses the real needs here. Heavy urban settings and inner =cities need redevelopment and investment. Villages and market towns need protection from development and sprawl. And the greenbelt is incredibly precious to all of lives and the environment around us. We must protect it - even if the Govt has relaxed its view of development that doesn't mean we should all throw common sense out of the window and build on it. When it's gone, it's gone forever. PLEASE PLEASE PLEASE stop the plan and reassess.
Included files	
Title	Question: Any other comment
ID	EGS3833
Person ID	1263959
Full Name	Susie Hurst
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
QUESTION ANY OTHER COMMENT comment	Public Consultation is an inclusive and continuous dialogue between the decision makers and individuals and organisations that are affected directly or indirectly by a decision, as well as those who have the ability to influence the decision, both positively and negatively. I therefore assume that the points raised above will be given due consideration and trust this assists in influencing your decision making.
Included files	
Title	Question: Any other comment
ID	EGS3887
Person ID	1263994
Full Name	Ian Selinger
Organisation Details	BTC leadership team Berkhamsted Theatre Company
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Here is the response from BTC. I tried to post on the website but failed!
Included files	
Title	Question: Any other comment
ID	EGS3888
Person ID	1263982
Full Name	Lisa York
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	You are ruining Berkhamsted my home town of 50+years, too many homes, too many cars and the infrastructure cannot cope anymore
Included files	
Title	Question: Any other comment
ID	EGS3905
Person ID	1263998
Full Name	Mrs Lara Dixon
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I only found out about this Plan a few weeks ago from a friend. I cannot be the only resident who feels ill informed and those without regular communication through social media will be at a disadvantage. Many people are isolating because of covid and will not be informed of the plan through their usual community channels. I am worried that a lot of the residents will not take part in this consultation because they do not know its happening; not because they are apathetic or support the plan.
Included files	
Title	Question: Any other comment
ID	EGS3914
Person ID	1263924
Full Name	Susan Moore
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I should have liked to have been given the opportunity for a simple and straightforward Yes / No vote to these proposals on a local level.</p> <p>This document is too long and very few people will not have their voice heard because of it.</p> <p>A flyer through the door showing clearly on a map what development is proposed and the opportunity to return a yes / no vote on the proposal would give everyone a chance to have their say.</p> <p>Planners and the council will steamroll development because it is just too hard for people to object.</p> <p>I think it is absolutely disgraceful that Dacorum Borough Council, having known since February 2020 that we were in the midst of a global pandemic has</p> <p>a) taken a decision to proceed with this process in the full knowledge that meaningful consultation was impossible.</p> <p>b) has opted to produce an overly complicated method to enable residents to pass comment. My mother is 95, intelligent and objects to the housing development proposals in Northchurch but by proceeding in this fashion you have removed her democratic right to object to what her elected representatives are proposing and thereby excluded her from decision making in her own neighbourhood. It is shameful</p> <p>c) You have conducted this process in conditions of quasi secrecy. I do not know anyone in Northchurch who received any notification of this process. This in itself should constitute grounds for this process to be halted</p> <p>d) My understanding is that no Traffic survey, no arhaeological survey and no Habitat survey has been carried out in Northchurch. Again my understanding is that these are requirements and without them the the process you are carrying out is therefore invalid.</p> <p>e) excluded those residents who either do not have access to appropriate technology or the ability to effectively use such technology</p> <p>f) has carried on with this plan regardless of the fact tha a neighbouring district, St Albans District Council in November 2020 abandoned itsLocal Plan, 2 of the reasons being</p> <p><i>These include the need to recognise the impact of climate change and the need to ensure any new developments will meet strong sustainability standards.</i></p> <p><i>We also have to bear in mind that the Government has proposed major changes to the planning system and that may alter the whole Local Plan system</i></p>

DBC however has refused to take a similar approach, particularly in light of the proposed government changes to the Planning system. Again this is shocking behaviour

Instead of working in the interests of residents, it shows complete disdain for them and instead panders to the interests of the developers who own the packets of land around Northchurch (not West Berkhamsted as it is referred to)

Included files	
Title	Question: Any other comment
ID	EGS3957
Person ID	1264025
Full Name	Caroline Sherwen
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Please rethink this plan. It's excessive by the sheer quantity proposed and harmful to the environment on this scale and in the green belt locations earmarked for it. We have the opportunity to think more creatively about how we can build more houses in a genuinely sustainable way for the environment, and for those in need of affordable homes. This plan will have an irreversible and detrimental impact on the nature of Berkhamsted and Tring and the surrounding countryside. It should not go ahead.
Included files	
Title	Question: Any other comment
ID	EGS3986
Person ID	1264035
Full Name	Alex Knowles
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I received the brochure today - 25th Feb 2021, for the Dacorum Local Plan 2020-2038. I live on Darrs Lane, Northchurch, opposite a field where there is proposed development. The deadline for objections to the Dacorum Local Plan 2020-2038 is 28th Feb 2021. I find this almost fraudulent that a consultation can go on during a pandemic when we are dealing with shielding, lockdown, school closures and many other physical and mental health issue. I will be submitting an objection via email to Dacorum Planing, but find it hugely upsetting and deceitful that they are tryng to "sneak" this consultation through while we are distracted with a pandemic. In summary, for my full objection letter - we are a protected greenbelt, we are semi-rural and will no longer be if this development goes ahead, I live here for the access to fields, woodlands, flora and fauna in the countryside that I can bring my children up in and we are already struggling with the infrastructure. Darrs Lane is single track at points and full of pot holes which reaccur every winter. The small Tesco that serves Northchurch is already struggling with parking issues. Even if more amenites were provided, we still live in a valley and there are untold waste and run off issues. And lastly Dacorum have not addressed the speed limits on our roads around the school. A 9 year old girl was killed on Northchurch High street after being hit by a van 2.5 years ago. An asolute tradegy that we never want to see repeated, and adding to the strain on shops, schools and other ameneties we probably will.</p> <p>And above all Northchurch will cease to exist and no longer be here as a village. We don't want to be "West Berkhamsted" and indeed we are not. And we want to exist as a village which is why we live here.</p>
Included files	
Title	Question: Any other comment
ID	EGS3987
Person ID	1263016
Full Name	Joanna Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>85% of Dacorum is rural, 60% is Green Belt and 33% of the countryside is within the Chilterns AONB. Although the Local plans states that a key objective is "minimising and managing the requirement for development on Green Belt Land and the impact on the Chilterns AONB", it is clear that in their declared mission to provide at least 100% of their self-assessed housing need, regardless of the impact on the environment, infrastructure, climate change and biodiversity will cause significant harm to our local Green belt. it also jeopardises plans, currently under early stages of discussion, to potentially extend the AONB or upgrade its status to that of a National Park.</p> <p>Nearly all development proposed in this plan will be on Green Belt land. The Minister of State Robert Jenrick said on 16 December 2020 on the recent consultation (Changes to the Planning Sytem August 2020) ... " we heard clearly through the consultation that the building of .. homes should not come at the expense of harming our precious green spaces. " on that same day the Government published a response to the recent white paper consultations and said (in reference to protected landscapes and Green Belt): "We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places."</p> <p>The Strategy fails to take into account the combined impacts of the coronavirus pandemic and recently expanded permitted development rights , both of which create many more opportunities for conversion of commercial space (especially office and retail) to residential use, and thus windfall provision of housing throughout the Borough is probably going to be much higher than estimated. Please look at regeneration of previously developed land instead of proposing to build on Green Belt.</p>
Included files	
Title	Question: Any other comment
ID	EGS3994
Person ID	1261840
Full Name	Rachel Heath
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Two key issues need to be addressed

1. The timing of the consultation in a pandemic when viewing plans and discussing views face to face is very limited is underhand. Combined with the lack of information - none through our doors in the Hall Park end of Berkhamsted - has severely limited the number of people I know, many elderly, who have not the technology skills or confidence to respond yet the plans will build on their doorstep! Please consider extending the consultation or redoing after you have solved issue 2.

2. The algorithm for the number of houses in Dacorum is based on a 2014 calculation and is no longer considered accurate (advised of this by Berkhamsted Citizens Association, and others who have emailed me directly). Please recalculate on the most up to date algorithm and without building on greenbelt land. Maybe if the required number of houses is less the plan will not need to look at greenbelt sites.

Included files

Title Question: Any other comment

ID EGS4008

Person ID 1263249

Full Name Claire Whitely

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan requires substantial additional assessments to supplement the evidence available, including more detailed assessment of housing supply requirements, opportunities for delivery in established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It's clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have yet to be identified which justify development of the green belt land.

Taking into account the socioeconomic and physical infrastructure associated with Hemel Hempstead, it seems that Hemel Hempstead should take the vast majority of the housing needs. There is also greater opportunity for substantially increasing density provision of brownfield land to reduce the cumulative impacts on green belt land and reduce the environmental impacts on tightly constrained settlements located elsewhere in the borough.

If a satisfactory process to determine an objectively assessed housing need demonstrates there is a need for allocating green belt land for development, such a requirement should consider the varying characteristics of the landscape and

its contribution to the functionality of the green belt and AONB. Greater consideration should be given to the density opportunities associated with sites that can prove to be needed for allocation, especially with regards to the current assessment of opportunities available for Tr01 Dunsley Farm due to its substantially reduced impact on the green belt in comparison to the sites Tr02 and Tr03 east of Tring.

Included files

Title Question: Any other comment

ID EGS4011

Person ID 1264047

Full Name James Puddiphatt

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I don't approve of much of this local plan.

Far too much emphasis on greenbelt land. Not enough brownfield land has been identified for development.

The housing target is too high for the area and its associated population growth, amenities and roads and facilities.

The Northchurch East of Darrs Lane and LockField developments should not be built and are ill conceived because of poor roads and infrastructure to cope with the traffic, the amenities are not even enough for current residents/community.

Roads and parking is already maxed out.

Wildlife corridors and habitats have already suffered because of recent housing developments, will suffer yet again and species will die out.

Personally, Granville road is already congested and safety of residents is a real concern. Especially younger children walking to school.

Bell Lane has ancient hedgerows and is a sunken lane. It is not sensible, nor logical to propose this road as a link to the East of Darrs Lane housing development. Its extremely concerning that there is a proposal for a school, on this land. Why not extend current school sites and locations to accommodate reasonable housing numbers which is more sustainable for Northchurch and Berkhamsted. Ashlyns school has adequate grounds to be extended. Northchurch children can still then walk safely to Ashlyns / local school without congestion and pollution impeding them and their health.

Local heritage and AONB will be ruined and decimated if the East of Darrs lane development goes ahead.

Can you not consider the Majestic wine and land at the end of Northbridge road for this scale of housing,, where there is already infrastructure in place (road that can cope with the volume of traffic). Land at the back of Tesco and Fitness First car park (we already have a multi story car park). Loxely road garages could be reclaimed and used for starter homes/ flats. End of Chaucer Close garages could be used . Unused office spaces or above shops for social housing and empty retirement homes.

Included files

Title Question: Any other comment

ID EGS4042

Person ID 1261199

Full Name Will Bentley

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I am deeply disapointed in, and vehemently opposed to, the Local Plan, both as a whole and specifically the Housing Delivery proposal across the Borough and as it relates to Berkhamsted's Proposals and Sites.

The Introduction talks about "preparing a positive plan that is seeking to meet as much of our objectively assessed needs as we can. For housing, we are making a bold commitment to significantly increasing the supply of land to deliver 922 dwellings per year...". Given this is nearly three times as many houses as the Government's own estimtes are saying are needed, the plan is dong anything but meeting objectively assessed needs!

Further, the Vision, amongst other things, talks to "Promoting healthy and sustainable communities and a high quality of life", "To enable and support active lifestyles through the provision of open spaces..." and "to ensure that all development contributes appropriately to local and strategic infrastrcture." Has the plan been objectively assessed against its vision and objectives. It is clear to me that it has not as the proposals reduce the access to and availability of open space, severely and negatively effect the health and wellbeing of residents and will put under great pressure and already struggling infrastructure.

This plan must be rejected and urgently revised. Further, more must be done to raise awareness of the revised plan by Dacorum to allow residents time to respond. Few of the people I have spoken to are aware of the plan or consultation and while, as stated at the recent council meeting, you may have met your "legal obligation" of distributing leaflets to do so only weeks before closing a consultation and expecting residents to be able to digest a 400 page plan plus hundreds of detailed supplementary documents is frankly insulting and appears as though you are trying to approve this plan by stealth, and are not meeting your moral obligation to the communities that you server.

Please come up with a plan for the Borough not for Westminster.

Included files

Title Question: Any other comment

ID EGS4056

Person ID 1207786

Full Name Anne Foster

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Greenbelt

DBC Should be challenging the governments housing numbers. The Government has reiterated many times that Greenbelt will continue to be protected. Not least in

• *Paragraph 9 of the 2017 DCLG “Planning for the right homes in the right places: consultation proposals” which states that “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.*

• And in a response in December to the proposals in the consultation on Planning for the Future White paper, with reference to protected landscapes and Green Belt it “We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.”

meeting housing need is the only reason given for the proposed destruction of large areas of Greenbelt – clearly in the Government's eyes this does not meet the exceptional circumstances required by the NPPF to justify the release of large swathes of Greenbelt for development

• The same response also states that “*Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints.*”

DBC appears to have ignored this and simply accepted the Government’ figures as definitive.

Northchurch

It is unacceptable to write off the village of Northchurch - calling it West Berkhamsted throughout the plan. Northchurch a village in its own right, just like any other village in Dacorum, and with its own identity and Parish Council has been completely ignored as an entity and simply lumped in as West Berkhamsted.

No consideration as been given to the impact on the village of Northchurch on particular of the BK06 and BK07 sites, nor of the developments to the East of Tring. Indeed I believe there is hardly a mention of Northchurch in the plan and the Transport Study even managed to move St Mary’s school from Northchurch to Gossoms End. I would wish that this is addressed in the final plan and that Northchurch is given the same, and separate, consideration as the other villages in Dacorum.

TRING Developments

How can there be any justification, for proposing to increase the size of a small market town by 55%, simply to accommodate unsupportable numbers. No consideration has been given to the impact of the numbers on the character of the town, and nowhere has the impact on Northchurch High Street and Berkhamsted, of additional traffic from those sites, to use Berkhamsted’s facilities, been assessed.

Many from Tring already use Berkhamsted station (cheaper, more trains, more parking), Waitrose, and the town’s other facilities, and similarly many Berkhamsted residents drive to Tring particularly to visit the large Tesco. Again developments in Tring are too far from the town to be called sustainable, car journeys are required for most to access the facilities in either town.

There will be a substantial increase in traffic through Northchurch – a narrow high street with children crossing to get to school and elderly people from the Mandelyns site crossing to the local shop or bus stop. Standing on the small pedestrian island in the middle of the narrow High Street with lorries whizzing past either side is already a terrifying experience.

Northchurch is already an AQMA – children at the school are unable to use their main playground fronting the High street because pollution levels are too high.

Incomplete IDP

Although I understand it is not mandatory to supply an IDP as part of the local plan consultation, it's impossible to judge the proposals without it, so it is an essential document.

However the draft IDP is almost impossible to read with site tables which conflate Hectares and units (is it possible to have 0.38 of a public park?), and Developer Contributions which may or may not include funding from other sources -Education for instance where costs are shared with HCC – but does the figure quoted include the HCC cost or is it just the developer contribution as stated. There are no Developer costs in the IDP for the Transport Study proposals – though all sites are expected to contribute.

I understand that hectarage for green infrastructure on each site may not even be site related just a formulaic calculation of how much space should be provided, for the given population, shared out between the sites (Discussion Strategic Planning 22/2/2020). These figures are of great import to the public in assessing these sites.

Developer contributions in the Berkhamsted summary are shown at £31k per unit, but no transport costs are included and does that figure include HCC contribution to education.

I understand that the viability of the proposed developer contributions will be assessed and updated for Reg19. The details in the IDP and the proposals for each site are an integral part of the public's ability to understand and comment effectively on the plan. Including figures which are at best formulaic and may not even be attainable means we are wasting our time and energy commenting on a plan which appears to be an as yet uncostered aspiration.

The IDP was made available at the very last minute after the start of the consultation, and was clearly not ready for publication.

It is not a valid document for the consultation if it's incomplete and unspecific.

Parks

The only public park mentioned in Berkhamsted is on BK06. As Berkhamsted, although it has a number of green areas, has no public park in the true sense of the word – seating, pathways, flowerbeds, water features, trees etc, could I request that a true park is provided somewhere. The proposed 0.38ha for BK06 is very small to be categorised as a public park (but then this may not be the true hectarage). A proper park might indeed be classed as a SANG and address the issues of over use of Ashridge etc, simply providing another piece of grass will not.

Included files

Title Question: Any other comment

ID EGS4061

Person ID 1012318

Full Name Mrs Jane Hennell

Organisation Details Area Planner
Canal and River Trust

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Thank you for consulting the Canal & River Trust on the Emerging Growth Strategy.</p> <p>The Trust has provided comments on individual policies and supporting text via the consultation portal however we wished to make a few more general comments too.</p> <p>We are pleased to note that the Grand Union Canal is recognised as a special feature playing an active part in the heritage of the borough and that the wider historic environment is valued and protected. The Trust promote the canal as being a form of strategic and local infrastructure performing multiple functions, including sustainable transport, open space and green infrastructure, flood risk, drainage and water supply. We believe the canal can transform places and enriches peoples' lives due to the role it plays in;</p> <ol style="list-style-type: none"> 1 improving the physical environment, opportunities for people and the wider economy. 2 contributing to supporting climate change, carbon reduction and environmental sustainability. 3 the public benefits including people's health and wellbeing that it can help generate. 4 supporting future development, regeneration and improvement. <p>Waterways can help deliver a range of policy topics or themes and it is important to consider waterways as a cross cutting theme or topic in plans. Waterways are multi-functional assets providing multiple social economic and environmental benefits. In addition to being a form of green and blue infrastructure, important for leisure, recreation and tourism uses, they can provide local and strategic sustainable transport routes. The Grand Union Canal and its various arms run through several local authority areas but most notably there needs to be cross boundary thinking between Dacorum and Buckinghamshire and Three Rivers.</p> <p>A supportive planning policy at local and neighbourhood level can assist in unlocking the potential contribution and value of waterways to economic, social and environmental wellbeing of regions, districts, communities and individuals; along with protecting these valuable assets for the benefit of current and future generations.</p> <p>It is therefore vitally important that planning policy recognises not only the multi-functional nature of waterways and the contribution they can make to wider economic, environmental and social objectives such as public health, renewable energy and sustainable development, strengthening resilience and creating conditions suitable for growth but their cross boundary nature so that proposals to develop on or alongside the canal are treated equally in the region to ensure that one area does not suffer from undue pressure for development as a result in variations in planning policy.</p> <p>The Grand Union Canal and its Arms has an important role to play in delivering aspirations for sub-regional and local accessibility by providing a safe and convenient cycle route that connect people to jobs, key services and recreation</p>

opportunities. Enhancing the capacity, safety and attractiveness of the towpath and connecting existing and proposed pedestrian routes, particularly to and within town centres, may support increases in walking for local trips.

The Trust is concerned that the towpath is not being adequately promoted as an active Travel Route throughout the plan, and although there is mention of the need to improve pedestrian and cycling routes in some allocations, it is not clear if this would include improvements to the canal towpath. In some cases this type of improvement is not listed within an individual allocation where it would be appropriate.

Developments can place additional liabilities and burdens onto the waterway infrastructure. Works to towpaths may be necessary to address the extra traffic resulting from new development, or safety upgrades may be needed to our reservoirs. If these opportunities are to be realised and the impacts mitigated planning policies and infrastructure delivery plans should address the funding of such works. Please contact the Trust as we are happy to discuss whether infrastructure works to our network would be most appropriately funded via s106 or Community Infrastructure Levy.

The Canal & River Trust is pleased to note that the Council have created a policy relating to the Grand Union Canal but note that there is a separate policy relating to residential moorings despite the findings of the Evidence paper and we query the necessity and justification for this. We would welcome the opportunity to work with the council to ensure that the two canal related policies are fit for purpose and there are some elements of these policies and supporting text which raises matters of concern. We would welcome the opportunity to meet with the council to discuss this further before the next stage of the plan in order to prevent the need for an objection at a later date.

Whilst a new mooring development, whether for leisure or residential purposes may well satisfy various land-use planning considerations and be appropriate in many respects, in order to be delivered, it would also have to successfully pass through the Canal & River Trusts own application process and obtain the necessary connection agreement which would permit it to physically connect to the Trust's waterway network. The acceptability or otherwise of a marina or other offline mooring proposal to the Trust is based primarily on consideration of availability of water resources and navigational safety.

It may be useful to add additional wording to the Explanation to this Policy advising applicants to undertake pre-application discussions with the Canal & River Trust in respect of any future marina proposals to enable them to be able to demonstrate that the canal network is capable of accommodating the proposal.

We ask for greater recognition that Green infrastructure includes blue infrastructure. This is not mentioned in the main text (just a footnote) and the GI definition in the glossary does not make this clear and refer to greenspace, yet no definition is provided of greenspace. We note that the definition of open space includes waterways, thank you.

There is little mention or recognition of the Tring reservoirs as an ecological or recreational resource and although the plan mentions a desire to increase the recreational use of the canal by encouraging water related activity this does not seem to be reflected in any policy or allocation.

Finally, The Trust will continue to work with the council to protect the heritage, environmental and recreational value of the canal and safeguarding it against inappropriate development supporting its ability to deliver economic, social and environmental benefits to local communities and the nation as a whole and secure the long-term sustainability of the

canal and its arms, their corridors and adjoining communities. Please note however that Canal & River Trust is written with an ampersand not the word 'and'.

Included files

Title Question: Any other comment

ID EGS4080

Person ID 1144499

Full Name Mr Robert Emberson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Environmental Management

Our footpaths and bridleways have come under increased pressure with many more using them for their daily exercise. During the very wet winter months we now experience many of these have become nearly impassable with deep mud & water. Farmers have commented on damage to their crops as people widen the paths to avoid the mud.

This gives some indication of the sort of pressures the Chiltern countryside & particularly the popular areas of outstanding natural beauty such as Ashridge & Ivinghoe Beacon will experience with the proposed increase in population of some 50% on the Green Belt at Tring, immediately adjoining the AONB. For example in the past bluebells have been nearly entirely eradicated from Burnham Beeches, where once abundant & other flowers once common such as orchids have in many places vanished.

With regard to hedges: some years back there was talk that these should only be cut every three years or so, allowing regeneration & providing vital winter berries for birds & mammals. Unfortunately it now seems universal for these to be savagely cut with tractor flails every year, leaving literally no food or shelter for wildlife. Perhaps there could be a drive to reverse this practice. If hedges have to be cut regularly to provide roadside visibility, the field sides & tops can be left for much longer.

Included files

Title Question: Any other comment

ID	EGS4110
Person ID	1264238
Full Name	The Box Moor Trust The Box Moor Trust
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Box Moor Trust is a charity which originated in 1594. Initially it was just a manager of agricultural land, but now the large estate, comprising woodland, grassland and water meadows, also provides exercise, leisure, sporting and learning opportunities for its many thousands of beneficiaries in Hemel Hempstead, Bovingdon and Flaunden.</p> <p>The Bulbourne and Gade river valleys lie at the heart of the estate and as examples of globally rare chalk streams, are key features in the great variety of ecosystems which Box Moor Trust land offers. Successive Local Plans and Core Strategies have correctly identified these catchments as over-abstracted, but the rivers continue to suffer from low flows and ecological stress.</p> <p>The Trust is therefore pleased to see and supports policy DM33, which seeks to protect and enhance river character and the water environment. Objective DM 33 c is particularly important in highlighting the need to avoid abstracting water from the ground. However, the Trust is concerned that policy DM 33 does not appear to be supported by a clear vision (nor a timeline) as to how the policy will be achieved, particularly since urban development, identified in other policies, will put further stress on these rivers.</p> <p>The Trust is keen to support wildlife corridors and the enhancement of green spaces and biodiversity. Much of the Trust's land does in fact form corridors, particularly along the Bulbourne towards Berkhamsted and in the direction of Bovingdon. It would not wish these corridors to become isolated. In relation to this, the Trust broadly supports policies DM 28, DM 29 and DM 30. It hopes that these policies would be applied rigorously and that a system for measuring and recording biodiversity net gain should be put in place. Where development is necessary, the Trust would support the strong compliance of policy DM 224a, c, d, and f, by way of mitigation. DM 37 is also supported, but the Trust would like to see a strengthening of DM 37 1a, in relation to ecological connectivity.</p>

The reduction of pollution into or around the Box Moor Trust Estate is an ongoing concern and the Trust therefore notes and supports policy **DM 35**, particularly **DM35 c**, concerning water quality.

Policy **SP 11** identifies development at Bovingdon Brickworks Growth Area. Such a development would be adjacent to Box Moor Trust land at part of the old brickworks, and now a Local Wildlife Site. The Trust would not wish to see any detrimental impacts to the Wildlife Site caused by development; rather that the Trust could work with developers to ensure they improve their site through off-setting and biodiversity net gain.

The Box Moor Trust hopes that policies, in the new plan, will be properly implemented, so as to protect and enhance the green spaces of not only its own estate but those throughout Dacorum.

Included files

Title Question: Any other comment

ID EGS4140

Person ID 1264064

Full Name Melanie Ingram

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate

provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS4143

Person ID 1264266

Full Name Carolyn Nicholls

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Water Supply. I am deeply concerned since we have no reservoirs. We cannot supply huge number of new builds from underground aquifers and the River Gade. This system is already under stress.

Included files

Title Question: Any other comment

ID	EGS4161
Person ID	1264279
Full Name	Ron Tindall
Organisation Details	County Councillor for Hemel Hempstead St. Pauls and Dacorum Borough Councillor for Adeyfield West Liberal Democratic Party
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	
Included files	21.02.26. Official DBC Liberal Democrat Response..docx
Title	Question: Any other comment
ID	EGS4229
Person ID	1264301
Full Name	James Stringer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS4237

Person ID 488120

Full Name Mrs J Toon

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The consultation on the Local Plan has not been publicised sufficiently, especially to the most affected residents (those who live close to proposed sites), who did not receive the Council leaflet here in Northchurch, and many of whom are still unaware of the consultation as it ends. Sending a leaflet to every household would have been the best way to get in touch with residents and make them aware, especially during a pandemic.

People without good access to the internet and without a computer have been disadvantaged and excluded from this consultation as libraries are closed (to view the consultation) and to respond (responses seem to require web access/email). To be inclusive, it ought to be possible for residents to write a letter with their objections, which a Council officer then allocates to the correct section of the Plan. Requiring people to respond on this portal by feeding back in a very prescribed way excludes many people from the consultation and is onerous and therefore discourages public engagement.

There have been technical difficulties which discourage engagement. My husband has asked for a new password for the portal four times and is still waiting for it to be sent. He will be emailing his comments instead.

I would like to reiterate that Northchurch is a village (we have a parish council) and we are not part of Berkhamsted as stated in this Plan. On that point of having to navigate the portal, I do not have the time to read your entire evidence base to find the bit that states this wrongly, so I am including this here. I have previously stated that Table 1 in Section 6 does not include Northchurch under 'villages', which is an omission.

Similarly, to state again, the numbers from Central Government this consultation is based on are wrong. I do not have time to find the relevant bit in your evidence base to prove this point, which was made by your ruling party Tory councillors in the full council meeting on 25 February 2021. The point has also been made by LibDem councillors and solicitors who have looked into this so I am confident to base my objection on it.

I have just learned that the Council will treat the pre-printed feedback form from Thakeham developers, which people just need to sign and date and send back, with equal weight as the responses received in the portal. It took me several hours to make my objections while it would have taken me 2 minutes to send an approval. Therefore I believe this process is unfair as it encourages positive responses and discourages negative ones.

Lastly, I question whether during a pandemic and through lockdown was the best time to hold this consultation. Many people are busy at work, home-schooling, ill with Covid, have lost loved ones, are not coping and shouldn't have been expected to deal with such an important consultation on top of all that.

Included files

Title Question: Any other comment

ID EGS4252

Person ID 1264320

Full Name JACKIE GLOSSOP

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS4254
Person ID	1264320
Full Name	JACKIE GLOSSOP
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS4291
Person ID	1264269
Full Name	Paul de Hoest
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS4331
Person ID	1261265
Full Name	Richard Case
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Impact of recent changes</p> <p>Timing makes it a challenge but the DLP needs to be revised to take into account the impact of Covid and societal adaption in terms of high street retail, increased internet shopping, change of working practices impacting commuting and increased broadband demand from local and home working. There is likely be an increase in sites that previously were for commercial use becoming available for residential. A permanent increase in working from home is also likely to have a marked impact on the required supporting services. These changes also need to be reflected on in plans for collaboration with the surrounding boroughs and districts, such as St Albans.</p> <p>Misleading information</p> <p>We also note that several areas in Berkhamsted that are shown as "Open Land" are in fact school properties or allotments and are either not open to the public for access, or only very limited access, this is very different to a park.</p>
Included files	

Title	Question: Any other comment
ID	EGS4389
Person ID	1264349
Full Name	STEPHEN BARTH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	1 I am very concerned at the Council 's regard for consultation as I have not had nor seen any publicity from the Council about this local plan.
Included files	

Title	Question: Any other comment
ID	EGS4402
Person ID	221837
Full Name	Mr Robert Wakely
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I am opposed to the Bulbourne Cross proposed development by Thakeham, between Berkhamsted and Bourne End. Because of the impracticability of providing adequate supporting infrastructure without unacceptably increasing the environmental damage, traffic congestion, air pollution, and risk of worsening road safety, and the burden on already overstretched roads, parking, schools, health services, sewers, surface drainage, water and other utilities. I am also

opposed to the development of any green belt land until all other available sites have been fully utilised. Green belt development should only then be allowed to meet the need for social housing for people who are completely unable to afford to either rent or buy here currently. I do not agree that green belt should be used at all to allow developers to generate excessive profit.

The proposal fails the criteria for a sustainable development on the grounds that it would:

- permanently remove from production valuable arable land
- therefore reduce the availability of locally sourced food
- increase carbon emissions, despite the claims made by Thakeham that buildings would be constructed using carbon neutral materials, and that energy needs would be provided using green power sources, other elements such as roads and pathways would not be carbon neutral, and the development as a whole would result in a net overall increase in carbon emissions during use, because of the lack of sustainable zero carbon transport provision
- increase car use, as the proposed additional public transport (even if it were actually provided) would be inadequate to meet the transport needs of residents living so far from the town centre amenities
- have a severe impact on local wildlife diversity, particularly on species which are already suffering dramatic declines - the fields included in the proposal currently provide nest sites for red listed skylarks and the adjoining hedgerows for red listed yellowhammers as well as numerous other bird and small mammal species; see

birds-of-conservation-concern-4-leaflet.pdf (bto.org)

<http://www.rspb.org.uk/ourwork/conservation/biodiversity/keyspecies/birds/skylark.aspx>

In addition, if allowed, the proposed development would create a precedent meaning that further development on Green Belt land adjacent to the A41 Berkhamsted bypass could not in future be effectively resisted.

Included files

Title Question: Any other comment

ID EGS4428

Person ID 1264378

Full Name Nicholas Kurth

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No	
QUESTION ANY OTHER COMMENT comment	I attempted this morning to contribute to the Dacorum Local Plan consultation but after an hour, found the exercise impossible to penetrate via the website.
Included files	
Title	Question: Any other comment
ID	EGS4484
Person ID	1264316
Full Name	Melanie Turner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS4498
Person ID	1264403
Full Name	Jake Latham
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	

QUESTION ANY OTHER COMMENT comment	Lack of consultation with the local community There has been a severe lack of consultation of the development plans with the local community, plus due to National lockdowns, there has been very limited opportunity for objection, particularly for the vulnerable.
Included files	
Title	Question: Any other comment
ID	EGS4552
Person ID	1261836
Full Name	Richard Sutton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>My family and I moved to Dacorum in 2018 to settle in Berkhamsted for at least the next 25 years. Over this time, we look forward to developing ever stronger links throughout the community and watching our young children grow to adulthood. As such, we have a vested interest in seeing the Borough grow in a way that works for all its citizens – both existing and new.</p> <p>Against this backdrop, I wish to formally state my strong objections to the ‘Dacorum Local Plan (2020-2038) Emerging Strategy for Growth’. The evidence suggests that, if this plan is approved, your personal legacy will be of considerably worsening towns and communities within the Borough. For new residents moving to the area and for those already here. For all ages. And for all financial situations. I suspect you don’t want to be remembered after you leave this office as the person who caused such damage to an area. So, I ask you to fundamentally rethink.</p> <p>Due to the COVID-19 constraints on travel and mingling for the past year, my experience, and hence prime objection, focuses on the portions of the Local Plan relating to developments in the Berkhamsted area.</p> <p>To summarise:</p> <ol style="list-style-type: none"> 1. Flawed modelling of number and type of housing required would fail to meet the actual needs of the voters moving into the area, whilst disrupting those already here far more than is needed. 2. Inadequate commitment to transport infrastructure needs to accommodate the changes proposed would result in a legacy of decades of traffic congestion for voters in Dacorum and visitors to the area.

3. Insufficient provision of water supply, wastewater disposal and other infrastructure would leave households with shortages and damage the local water table, with knock-on considerations around subsidence and environmental impact.
4. Unworkable assumptions around public transport and foot / bike journeys would see considerable increase to carbon emissions in the Borough and considerable travel delays around vital transport hotspots (town centres, schools, rail stations, etc.).
5. The above worsening of conditions for the new and existing voters in the area also comes with an ecological cost due to the loss of green belt. If green belt is to be repurposed, it must be done in a way that makes the greatest positive impact for the current and future residents of Berkhamsted. This plan wastes that sacrifice.

These are fundamental flaws in the strategy underpinning the 'Dacorum Local Plan (2020-2038) Emerging Strategy for Growth'. As such, this plan should be rejected outright, and a new plan drawn up that addresses the actual needs of the area for today and the long-term success of the Borough.

These points are expanded below.

Incorrect Assumptions for Housing Provision

Whilst accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, the scale of proposed development in Dacorum is out of balance with the long-term needs.

The Local Plan does not take account of National Planning Policy Framework (NPPF), paragraph 11, footnote 6, which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and Area of Outstanding Natural Beauty (AONB).

Recent Government guidance on calculating housing need has been, at best, confusing. The algorithm for calculating housing need that has been used by the Council is a flawed means to calculate the housing needs of the Borough, based on old data.

The correct calculation of the housing needs in Dacorum should be based on the most recent and relevant data, which is currently the 2018 based Office for National Statistics (ONS) projections. Instead, the Local Plan is based on calculations using outdated 2014 based ONS data, which results in a significant overestimate of housing needs.

I note that on 16 December 2020 the UK Government published its response to the local housing need proposals on the consultation on changes to the current planning system. This sets out important changes to the standard method which has been amended so that the 20 most populated cities and urban centres in England (none of which are in Dacorum) see their need uplifted by 35%. The Government also said:

"More broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We (Government) should be clear that meeting housing need is never a reason to cause unacceptable harm to such places. ...

Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt."

Failure to Provide Adequate Supportive Infrastructure

Looking at the proposed developments on Green Belt land, there is insufficient consideration in the Local Plan for the provision of new infrastructure or upgrading the current infrastructure to support the scale of the proposed developments.

Taking a specific example of transportation, consider area 'Bk01 - South of Berkhamsted'. This proposes adding 850 residential units with 2 ways out of the development:

1. Emerging immediately next to a secondary school of over 1300 pupils; and
2. Passing two primary schools on a single, narrow residential road with a 10% gradient and car parking on both sides.

These roads are heavily congested during normal times with the current population – the road by the secondary school backing up during school run times to the main A41 route into and out of the town. Adding 850 households of cars will lead to transport paralysis for the new residents, the homes already in the area, pupils of the schools and people trying to access Berkhamsted from the A41 during peak times.

Similarly, increasing the number of dwelling by over 1,800 in the Berkhamsted area will result in a considerable increase in vehicular traffic through the centre of the town – a route that is already heavily congested at peak times at the A4251 / A416 junction and along the High Street. This is due to the historic layout of the town along a valley with steep sides meaning there are only these two roads into and through the town.

For the increase in population proposed in the Local Plan, there would need to be a considerable extra investment in road widening, traffic flow control measures and new roads to bypass the congestion points inherent with a medieval market town situated in a steep river valley.

Impact on Green Belt and Other Designated Land

The Local Plan states that a key objective is “minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB”. This strategic principle is then violated by the declared mission to provide at least 100% of the Council’s self-assessed housing need, regardless of the impact on the environment, infrastructure, climate change and biodiversity.

Noting that 85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns AONB, this approach comes at considerable environmental cost.

As such, the Local Plan must be fundamentally reworked to avoid such contradictions in strategic goals and principles.

You are now faced with a personal choice.

Whether to be remembered for taking the easy choice and sticking to an inherently flawed plan that will deeply damage the Borough of Dacorum forever – your lasting legacy – or to take the brave decision and do what is right – to reject the current plan and come back with one based on the actual needs of the current and future voters and households of Dacorum.

Included files

Title

Question: Any other comment

ID	EGS4560
Person ID	1262731
Full Name	Julie Battersby
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Local Plan is a comprehensive document that sets out a determined drive to 'sell off the family silver' at all costs. I am saddened that the Council chooses to lend its weight to accelerating loss of Green Belt land rather than preserving it and I caution such an approach when government targets are not being met to preserve hedgerows, retain the best agricultural land and preserve the Green Belt. A day of accountability for all thing environmental will come and this attitude will find the Council lacking in due course if the Local Plan is not amended to reduce housing provision with a more appropriate dataset for calculating need.</p> <p>There is always a balance to be struck between setting out sufficient information for the public to understand the issues and setting it out in a way that discourages people from commenting. The balance was not right here with the consultation method too cumbersome and timescale too short. I personally have spent more than 25 days reading, researching and writing to provide a considered comment and really needed much, much longer.</p> <p>By the time I found out about this consultation, which was following information recieved from a neighbour and not a direct communication from the Council, even so, there was insufficient time left for me to read the vast array of supporting documents. Holding the consultation during a lockdown, when parents have to teach their children at home, over Christmas and at the time when many people are struggling to prepare their tax returns is unacceptable. It prevents discussions being held, workshops being attended, research from undertaken and sites being visited. It ultimately reduces transparency in local government and discourages public engagement.</p> <p>Therefore I do not give permission for the Council to count my lack of comment on these supporting documents as approval unless specifically indicated in the comments I have made in my Local Plan consultation response. I request that the consultation deadline is significantly extended to allow full consideration of a revised Local Plan based on reduced estimates of need.</p>
Included files	
Title	Question: Any other comment

ID	EGS4563
Person ID	1264429
Full Name	James King
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>One thing the Pandamic has changed is that people will be working from home a lot more, there is not the need for houses to be close to commuter links.</p> <p>The plan needs to be reviewed and some of the other areas with space away from the traditional corridor considered.</p> <p>Otherwise the opportunity to create new growth areas with the new ways of working will be lost and the ability to support those in a sustained and environmentally friendly way.</p>
Included files	
Title	Question: Any other comment
ID	EGS4594
Person ID	1145918
Full Name	Mr Richard Tregoning
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	1) A Dacorum Local Plan is important to achieve a Community with good employment, housing, leisure in pursuit of Dacorum is great place to Live, Work and play

2)BUT the plan must be based on fact. There is no evidence to show the need for 16,516 new dwellings in DBC or 2730 in Tring
3)NEXT STEP Withdraw pland and start again based on fact such as census 2021 not just an abandones set of figures imposed by Central Government who have long ago abandoned any use of the outdated planning forecasts

Included files

Title Question: Any other comment

ID EGS4649

Person ID 1148944

Full Name Carol Atkinson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Firstly I consider that given the short timescales and the challenges with reading complicated documents and huge maps on line - you are not consulting properly and getting the full benefit of public wisdom.

Please think again and at the very least extend the consultation.

Included files

Title Question: Any other comment

ID EGS4658

Person ID 1264487

Full Name Mrs Sue Edmanson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Q9 Regarding Tring: consideration for housing for smaller households, retaining the character of Tring and keeping its market town environment and community, the Rothschild influence. Maximising renewable energy and modern efficient building methods.
Included files	
Title	Question: Any other comment
ID	EGS4678
Person ID	1264494
Full Name	AMANDA BEAMON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I also feel strongly that it is deeply inappropriate to push these plans through during a global pandemic and national lockdown. Many people are home schooling young children whilst also working and don't have time to engage with plans like this, and many others do not have internet access and are unable to. It is underhand and dishonest and unfair to progress with these plans in the current circumstances.
Included files	
Title	Question: Any other comment
ID	EGS4699
Person ID	1145431
Full Name	mr David van Rhee
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS4705
Person ID	1264499
Full Name	JENNIFER GUINOT

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I also feel we have been deliberately kept in the dark about these plans. We only received the Dacorum Local Plan yesterday in the post. And this comes at a time where everyone is distracted by all the difficulties that Covid 19 brings. Therefore the consultation period has to be extended until we are more or less back to normal.
Included files	
Title	Question: Any other comment
ID	EGS4729
Person ID	1152420
Full Name	MICHAEL AND PENNY WEBSTER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Perhaps, with the likelihood of a number of additional bright and innovative people coming on the labour market as a result of losing their jobs in the Covid pandemic. there might be the opportunity for local government to recruit additional new blood. This new influx could help the existing planning authorities better to adjust to a changed world where greater joined-up thinking is required to enable local authorities to reach optimum solutions for the housing needs in their community. One thing is certain, the general public are now, having endured significant lockdown constraints, no longer likely to be willing to accept what is offered by planning authorities without their input. The advent of crowd-funding to

finance local opposition to poor planning decisions , combined with immediate and enhanced social media communications, will see to that.

Included files

Title Question: Any other comment

ID EGS4738

Person ID 1264510

Full Name Martin Evening

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment The timing of this consultation during a worldwide pandemic and national lockdown has disenfranchised the public. In particular, not allowing full access to the many people who do not have internet access. The DLP document is too large to access and navigate on mobile devices, which is what the majority of the public will be using to view.

The only other available option is to make an appointment to visit the library to see the documents. However, our government has told the public to 'Stay at Home to Save Lives'. Few will choose to risk their lives by booking in to view the DLP at the library.

Included files

Title Question: Any other comment

ID EGS4744

Person ID 1262625

Full Name Katie Guest

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I tried to put this response in the website, but pressed submit before it saved this I believe. My response to section 24 was accepted but not my response to section 4, and I don't seem to be able to add any more comments. So please take this (below) as my response to section 7 Housing strategy.
Included files	
Title	Question: Any other comment
ID	EGS4749
Person ID	1263004
Full Name	Jill Townsend
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I strongly object to decisions being made now for the next 18 years. This takes away the democratic rights of the next generation to have a say in what happens in the area. The impact of the pandemic on the way we all live our lives, shop and work is yet to be seen. I strongly believe any proposed plans should be for no more than 5 years. These plans were not publicised sufficiently. I heard about it via Facebook! DBC sends me texts to alert me to changes to the refuse collection service - it would have been simple to send a similar alert to the plan's existence and a link to the website with the details.
Included files	
Title	Question: Any other comment

ID	EGS4750
Person ID	1264485
Full Name	Charlotte Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I am honestly horrified by these plans and how they would completely change the size and nature of all the towns in Dacorum. Easy access to countryside for residents will be lost by this plan building on greenfield sites. The quantity of dwellings planned is completely unrealistic in proportion to the current size of Dacorum towns. The pandemic has changed forever the where people live and work. This plan is now redundant in that light.
Included files	
Title	Question: Any other comment
ID	EGS4756
Person ID	1264512
Full Name	THELMA FISHER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I would also like to add that I think the plans in the booklet distributed to householders is misleading and gives no idea of the number of homes being considered.
Included files	

Title	Question: Any other comment
ID	EGS4770
Person ID	1253595
Full Name	Ian Lindsey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I wish the following response to be recorded: Your Consultation process is defective; I registered to comment but there is no obvious procedure for submitting comments hence this email. It is clear the DBC has made it virtually impossible to submit via the consultation website.
Included files	
Title	Question: Any other comment
ID	EGS4775
Person ID	1227337
Full Name	Mrs Anna Henry
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I would like to register my disagreement with the plans to build so many houses in Northchurch without proper consultation.

Plans should be paused until public meetings can be held to allow people to have their concerns properly addressed.

Included files

Title Question: Any other comment

ID EGS4808

Person ID 1264525

Full Name JENNY TYLER-KONDYS

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I tried to respond online but found it very difficult to do so. I found a big box saying "have your say" but just kept being re-directed to all the information instead of a simple form to respond.
So I am responding via email:

Included files

Title Question: Any other comment

ID EGS4847

Person ID 1264531

Full Name PAUL KENT

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS4850

Person ID 1257705

Full Name Mark Barfield

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
*** Yes**

* No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty.</p>
Included files	
Title	Question: Any other comment
ID	EGS4858
Person ID	1264475
Full Name	Simon Davies
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	

Included files	
Title	Question: Any other comment
ID	EGS4877
Person ID	1264533
Full Name	MAURICE OKEEFFE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>

Included files	
Title	Question: Any other comment
ID	EGS4896
Person ID	1150594
Full Name	Catherine and Mark Richardson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>Consideration for the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty.</p> <p>In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities</p>

available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS4914

Person ID 1264537

Full Name KATHERINE COURTNEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

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Included files

Title Question: Any other comment

ID EGS4919

Person ID 1264536

Full Name Mr George Harvey

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS4932

Person ID 1264540

Full Name JOSEPH DAWSON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

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surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS4941

Person ID 1260771

Full Name JAMIE BELL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

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Included files

Title Question: Any other comment

ID EGS4944

Person ID 1264521

Full Name Max Hidalgo

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Overall the strategy needs a rethink in terms of both local traffic, congestion and road safety and doing anything to avoid the unsustainable consumption of green belt land. The larger issue of local pollution and health and safety of market town residents in berkhamsted and tring should be a priority. On an even larger scale is the UK's aspirations for netzero, I believe the current plan falls well short of this as instead of mor sustainable redevelopment of brownfield sites new virgin greenfield will be destroyed.

Included files

Title Question: Any other comment

ID EGS4960

Person ID 1264546

Full Name Dr Calvin Veeroo

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS4985
Person ID	1264548
Full Name	Mrs Sasha Godfrey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS4991
Person ID	1264545
Full Name	Sally Mclver
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	This plan has been introduced during COVID-19 when there have been hugely reduced opportunities to consult and raise awareness of the plans locally. There has not been adequate local publicity of the plans or consultation because of this and the consultation period therefore needs to be extended for a few months after the end of lockdown in order for all local residents to input their views effectively.
Included files	
Title	Question: Any other comment
ID	EGS5000
Person ID	1264549
Full Name	Mrs Kate Carter
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p>

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.

Included files

Title Question: Any other comment

ID EGS5086

Person ID 1264258

Full Name Fintan FitzPatrick

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment No.

Included files

Title Question: Any other comment

ID EGS5129

Person ID 1250013

Full Name Mrs Nikki Bugden

Organisation Details Clerk
 Nash Mills Parish Council

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Based on experience of developments in Nash Mills, we're interested to know the processes in place to minimise developers from being able to do any of the following:</p> <ul style="list-style-type: none"> • Reducing the amount of affordable housing by claiming it is unviable? • Not providing the parking standards laid out for specific types / size of accommodation? • Gaining approval for development to include retail or community space which is reduced or removed during various iterations of plans to make way for additional residential space • Repeatedly submitting plans with minimal change (without meeting policies/standards)
Included files	
Title	Question: Any other comment
ID	EGS5145
Person ID	1264550
Full Name	Kevin Fielding
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Dacorum Plan is not currently fit for purpose. It is environemtnally damaging, not sustainable, and will detrimentally affect the lifestyles of many current Dacorum residents, including my own.</p> <p>This plan suggests the wrong place to buid homes - Green Belt with high biodiversity and high amenity value (such as that proposed for the South Berkhamsted Development) should not be destroyed in order to creaste profits for developers. Brown field sites should be used effectively to give local residents and their offspring the houses they need.</p>

The plan suggests the wrong type of housing development. We should not be encouraging large-scale sprawling estates of semi detached and detached houses outside our town limits. Instead, we should be utilising our brownfield sites to their maximum potential to provide starter homes and green urban living close to the bustling town centres. We should be limiting growth in housing to the available urban areas.

The plan suggests huge growth of housing for Dacorum at the wrong time. We have just left Europe (with some surveys suggesting over 1 million EU citizens have left the UK), we are coming out of a global pandemic (with resulting economic issues and working from home approaches), and we are entering a period of "levelling up" with areas to the North of the country. Put simply, this is the wrong time to be building excessively in already densely populated SE England.

In the case of South Berkhamsted development in particular, we will lose Green belt land with high biodiversity and amenity, destroying the habitats of ground nesting birds, felling ancient oaks and killing off the few remaining orchids in the area. And the result? Less access to the Green Belt for Berkhamsted residents, busier roads for our children to walk on, more sewage problems spewing out onto our gardens, and dirtier air for us to breathe. This is not the Cleaner, Greener, Safer Dacorum that I want to live in.

Included files

Title Question: Any other comment

ID EGS5183

Person ID 1264462

Full Name Penny Clifton

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

The target for the number of houses is incorrectly calculated and should be challenged, with the number revised significantly lower than the target. The number should reflect the actual need for housing particularly in the light of recent changes in population and society, as well as changes in commercial and retail demand.

I feel strongly that a higher proportion of the houses should be built on brownfield land, or through conversions, in existing urban areas and away from areas located in the green belt and close to the Chilterns AONB.

Lastly, this plan fails to recognise or take into consideration the climate emergency - despite the fine words expressed by Dacorum BC - and focuses entirely on housing needs to the detriment of the environment, wildlife and biodiversity, as well as the health and wellbeing of the residents. The plan will have an enormous impact on our area, particularly Berkhamsted and Northchurch - and our children and grandchildren will never forgive us if we get it wrong. I would hate them to one day say: "This used to be a such a beautiful part of the Chilterns" as they gaze out on a congested and polluted urban sprawl.

Included files**Title** Question: Any other comment**ID** EGS5198**Person ID** 1264036**Full Name** Shelley Piggott**Organisation Details****Agent ID****Agent Full Name****Agent Organisation****Yes / No** Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I am an educated and computer literate adult but I found it incredibly time consuming and difficult to find how to comment on these proposals. It was not possible to complete comments on a mobile phone. I also think it is very disappointing that the time frame for comment is whilst we are all still very much in lockdown , which means that many people will be unable to comment. I also think that by having an online consultation you are effectively limiting the number of people who can comment on it - elderly people or those without devises would find it extremely difficult.

Included files**Title** Question: Any other comment**ID** EGS5215**Person ID** 1264593**Full Name** Rebecca Mackenzie**Organisation Details****Agent ID**

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I do not see any real evidence for this level of growth in Dacorum. The only thing I see in my day to day living in Dacorum is a need for secure, low cost housing. More 'affordable' privately developed housing is not what is needed. Some people simply cannot afford 'affordable' housing. People also need security, which is not provided by the private rented system, a system which means families are turfed out of their homes at the whims of the landlord. This does not build sustainable, happy, safe communities. Quite the opposite. Please priorities the needs of those people in Dacorum who are struggling at the bottom, not those who are already very wealthy from building 'affordable' (not very) housing.
Included files	
Title	Question: Any other comment
ID	EGS5248
Person ID	1264608
Full Name	Nicola Beadle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS5317
Person ID	1264532
Full Name	Robert Clarke

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	It is particularly disappointing that there is no proposal to create a new hospital in Dacorum to meet the increased housing that is proposed.
Included files	
Title	Question: Any other comment
ID	EGS5320
Person ID	1263726
Full Name	Andrew Gifford
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The strategy is outdated and ill thought out impacting communities in the borough with further congestions, lack or creaking services, over priced facilities and has little regard for the climate and biodiversity.</p> <p>This coupled with the poor consultation questions the validity to the benefit of communities in the borough at large. Although there are question marks to the proposal itself the vision laid out by Thakeham for Bulbourne Cross has more merit and consideration for transport links, Green Space and its impact on communities along with the significant changes to our country with Brexit and COVID the strategy is outdated and ill thought out and will be a further increased legacy of deforestation and negative impact to our climate at large.</p>
Included files	
Title	Question: Any other comment

ID	EGS5345
Person ID	1264616
Full Name	Philip Daw
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS5366
Person ID	1264631
Full Name	Amelia Wallace
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS5380

Person ID	1264633
Full Name	Catherine Simmonds
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS5384
Person ID	1264599
Full Name	Mike Keeble
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Use of the greenbelt for more housing must be a last resort. I believe there will be huge local resistance to such developments, please list to your residents.
Included files	
Title	Question: Any other comment
ID	EGS5465
Person ID	1264636

Full Name	Lynsey Bilsland
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	A large development rather than multiple small ones on the edge of the town would make more sense backed up by recent data on the need for new housing in the area.
Included files	
Title	Question: Any other comment
ID	EGS5496
Person ID	1264617
Full Name	Victoria Latham
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The consultation has been wholly inadequate with very few of those affected properly consulted or made aware that a consultation was occurring, largely because of the pandemic, one suspects. No house in our road (Greenway) received the local plan until this week; I received it on 25Feb21 after requesting a copy, just four days before the consultation is due to close. With in-person meetings and social events currently suspended, the usual discussions and information dissemination routes are greatly diminished and community awareness of the consultation is very low.
Included files	
Title	Question: Any other comment

ID	EGS5505
Person ID	1264628
Full Name	sophie boden
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am incredibly disappointed that this consultation has continued despite the multiple objections delivered at the meeting of Wednesday 24th February.</p> <p>The point of consulting is to gauge a true picture of the views and suggestions of the public. You have excluded those who do not use technology (e.g. my 70 year old neighbour does not have a computer and so didn't know how to feedback her views - she is against the plans). We are in the midst of a pandemic, meaning a lot of people are extremely stretched and have little time to dedicate to reading through these documents (it has taken me 2 days and I still haven't read everything.)</p> <p>You need to rethink and consult again when people can see the plans and speak about it.</p> <p>In the mean time, please lobby the government to reconsider these inane requirements for providing housing for future years. Shouldn't the government be educating people and making us all reflect on the worlds finite resources? This shows very little social responsibility.</p> <p>I also want to say I find the level of information overwhelming. Shouldn't this have been broken down into easier sections? This is not a user friendly or positive experience.</p> <p>I really hope you will reconsider the plans and make a considered effort to make real environmental change.</p>
Included files	
Title	Question: Any other comment
ID	EGS5558
Person ID	1264048
Full Name	Alison Fraser
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	'Affordable' property that is for sale; how will you make sure that it stays 'affordable' for subsequent purchasers? Should there be a covenant on it? How will the house building process be prioritised so that local need is met first? Or will it be a case of developers 'cherry picking'; which is likely to bring in new people to the borough as much as meeting local housing need? Any building needs to be at the same rate as other boroughs for the same reason.
Included files	
Title	Question: Any other comment
ID	EGS5581
Person ID	1264651
Full Name	Tom Beecroft
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	There has been inadequate public consultation. There has been a flurry of activity in my village of Northchurch in just the past week as people have only just been made aware of this important and life-changing consultation. Most of us only had the brochures delivered to us in the past week after our Counsellor, Lara Pringle, raised the issue. The plans are deeply unpopular with everyone I've spoken to. The plans would: <ul style="list-style-type: none"> • obliterate our village from existence

- damage our local environment
- increase congestion
- increase our local population by up to 50%
- destroy 40 Acres of Green Belt land
- have a devastating impact on our mental health and well-being

I whole-heartedly object to the proposals for Nothchurch and Berkhmasted.

Included files

Title Question: Any other comment

ID EGS5583

Person ID 1264491

Full Name Paul Wade

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment The plan is not easy for members of the public to follow or comment on. I appreciate it is a complicated issue but has been presented in an overly bureaucratic way. Too many questions in the on-line form.
I also do not think DBC have done enough engage on the plan

Included files

Title Question: Any other comment

ID EGS5586

Person ID 1264363

Full Name Roselyn King

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I strongly suspect that many of Dacorum's residents are unaware of this Local Plan and your consultation on it. I therefore think that in the interests of democracy it is essential that you do more to publicize your proposals and allow people more time to give you their feedback.</p> <p>I also think that it's unacceptable that you have made it so hard for people to respond to your consultation on this online portal or the downloadable comments form by requiring people to read vast amounts of text before they can answer your questions. It's like being asked to read a whole textbook. It has taken me over 17 hours to complete my response (and I still haven't read every section of the Plan). Most people wouldn't have sufficient time to spare. The consultation has been designed in a way that is likely to put people off responding. I strongly suggest that in order to support democracy you make it viable for everyone to respond to your consultation by allowing people to email/post you their thoughts on your Virtual Exhibition or the equivalent paper summary of your proposals, whilst making clear where people can read the actual text of the Plan if they wish to do so. I request you to note that my opposition to the proposed developments in North Hemel is shared by the other 3 members of my household (who have not managed to submit a response to your consultation).</p> <p>I am also not impressed that this consultation has not been designed to be accessible for all members of the public. It demands that people read the text of the Plan, which uses language that is not designed to be easily understood by everyone. The Virtual Exhibition and its paper equivalent could also have used simpler, clearer English and it would also have been helpful for all potential respondents if they had contained larger, clearer maps of the proposed areas of development with clear marking of features that people might recognise eg road names, farms, hamlets. If you would like to make a democratic and non-discriminatory attempt to consult all of Dacorum's residents, perhaps you could take this feedback on board and produce a new and better Virtual Exhibition to help the public understand your proposals more easily.</p>
Included files	
Title	Question: Any other comment
ID	EGS5588
Person ID	1264657
Full Name	Amanda Hutchinson
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The plan has high ideals but no practical safeguards to ensure the ideals are not watered down in practise. It provides for much higher levels of new housing than are necessary or desirable and fails to protect the natural environment. All other considerations are subservient to the perceived (not real) need for new houses. Insufficient thought has been given to the means by which environmental concerns will be met, eg wildlife corridors, rewilding, tree planting, sourcing of water and disposal of sewage, net zero emissions from the building and running of the new homes.</p> <p>Any development must be accompanied by areas of accessible mixed woodland and rewilding areas to compensate for the destruction of the Green Belt.</p>
Included files	
Title	Question: Any other comment
ID	EGS5602
Person ID	1264675
Full Name	Lee Rowbotham
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>I live in Berkhamsted and find the plans to develop the town unrealistic and poorly thought out. If you take the Town Centre Junctions and congestion; with only one crossing in the town centre, HCC transport studies are clear there is no scope for new roads or widening in central Berkhamsted. The traffic lights perform at 'over capacity' at busy periods.</p> <p>Water and Sewage capacity; with the need to maintain the unique chalk streams in the area, the Environment Agency has capped abstraction from the local aquifer at current levels. The Sustainable Assessment identifies the need for additional capacity for the Borough as early as 2031.</p> <p>Medical and Social Care; the Plan makes no provision for additional local GP services, nor for Social or Dementia Care in Berkhamsted. We recognize that these services are not the remit of the Planning Authority but adequate and sound Public Health provision must not fall between the cracks of HCC/CCG/PHE.</p> <p>Schools: we note the potential provision of new Primary Schools, while a new 6FE Secondary School is posited on Site BK 06 in Northchurch. Capital Funding to build the school is unlikely to be sourced from a single development: additional revenue funding will be needed until its roll can attract funding to be sustainable. This must be identified in the IDP.</p> <p>Infrastructure Development Plan:</p>
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Included files	
Title	Question: Any other comment
ID	EGS5664
Person ID	1264035
Full Name	Alex Knowles
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
QUESTION ANY OTHER COMMENT comment	I shall email my response and objection to the responses email address and also have attached it in the next comment below.
Included files	Dacorum Planning Objection Letter_Redacted.pdf
Title	Question: Any other comment
ID	EGS5678
Person ID	1264405
Full Name	Natalie Beecroft
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>There has been inadequate opportunity for public consultation amidst a global pandemic.</p> <p>There has been a flurry of activity in my village of Northchurch in just the past week as people have only just been made aware of this important and life-changing consultation. Most of us only had the brochures delivered to us in the past week after our Counsellor, Lara Pringle, raised the issue.</p> <p>The plans are deeply unpopular with everyone I've spoken to.</p> <p>The plans would:</p> <ul style="list-style-type: none"> • obliterate our historical village from existence • damage our globally unique local environment • increase congestion both vehicular and foot on already insufficient infrastructure (narrow roads, narrow paths, tow paths) • increase our local population by up to 50% which is not organic and will harm and pressurise, if not destroy, community relationships • destroy 40 Acres of Green Belt land • have a devastating impact on our mental health and well-being

In summary, I strongly object to the proposals for Northchurch and Berkhamsted. We chose to live in Northchurch from Berkhamsted High Street for its village character, accessibility to larger amenities in Berkhamsted, stunning surrounding countryside which we can see from our house and garden, and the opportunity to be part of community. Something that the pandemic has shown, is vital to all ages and groups. We have for the first time in our lives, invested in our local community for the benefit of our village and our family. We support the school, church and our neighbours. These ambitious and unconsidered development plans jeopardise and destroy, the lives our community has worked hard for.

What will our legacy be if we destroy all this, taking away history, ecosystems, wildlife, community for the sake of national and local Government targets? Globally, we are not doing a great job of addressing and rectifying such issues. This is an opportunity for more than an individual, but a community, a town, a settlement, to lead by example and do the right thing and protect all our futures, in the right way.

Included files

Title Question: Any other comment

ID EGS5707

Person ID 1264710

Full Name Jess Malcolm

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I do not agree with these plans. Our community needs work from the inside out, expansion will not aid this. We need clean streets, we need to make run-down buildings safer which in turn will provide more housing, we need to use the spaces we have more efficiently like our high streets and shopping centres. Doing this will in turn positively impact the community creating healthier spaces and more employment due to better high streets and shopping centres.

More thought needs to be taken into how we protect the biodiversity and ecosystems within our beautiful surrounding environment. If we do not do this we will lose it completely, it is not about how it looks it is about the nature and wildlife!!

Included files

Title Question: Any other comment

ID	EGS5753
Person ID	1264737
Full Name	Daisy Cave
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>55% more housing using green belt goes against DBC Climate change goals. The number of houses is disproportionate to other areas of Dacorum and our roads and infrastructure will not be sufficient.</p> <p>When planning the development there must absolutely be truly affordable housing for young people to be able to start on the housing ladder.</p> <p>The proposals to move the Auction rooms and museum are shortsighted as these bring people to the town who then use our high street shops and restaurants. A better plan would be to help the high street thrive before expanding at the cost of 2 well established and historical businesses.</p>
Included files	
Title	Question: Any other comment
ID	EGS5755
Person ID	1264693
Full Name	David Collins
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment

Having received the very helpful and clear pamphlet about the new Local Plan, this gave me a good overview of the vision and intention of what the Plan proposes. As comments were invited, I thought I would contribute with some general comments of my own on the discussion website.

However, what I found on line was a very extensive and complex document which seems to cover every nuance and detail of the Plan. I guess the council have a legal duty to fully cover all of the topics that need comments but the complexity and detail of this has instantly stopped 99.9% of the community making any attempt add their views.

I congratulate residents who have waded through the document and the comments I have seen are valid and very good.

As a life long resident of Hemel Hempstead, I understand the need for enlarging the town and giving people the opportunity have their own houses etc. However, I see that unless the town infrastructure is improved significantly ie reinstatement of Hemel Hospital, more schools, local shopping/community facilities, improved roads, better public transport, extensive investment in the town centre to make it a community focal point etc then the risk is Hemel Hempstead will simply collapse and completely lose its unique identity as a "New Town".

The Hemel New Town areas (Highfield, Gadebridge, Chaulden etc) have always been open and distinct areas with easy access to countryside and parks and still retain something of the local community feeling. Will provision be made available for the proposed new residential areas to have the same open spaces, country access and the opportunity to become communities in their own right?

Also, if Greenbelt land is to be sacrificed to achieve this expansion and most of it is in and around the industrial area and outlying areas, what provision is being made to encourage manufacturing companies (small and large) to the town to create employment for the residential growth? Hemel thrived in 50s, 60, 70s when it was a manufacturing town with employment for all who wanted it. With the expansion of the town and no provision for work, there will a huge risk that all of the new areas will simply become dormitory areas where people simply live and new comers have no affinity for the town.

I doubt anything I have said has not been said before and are maybe the ramblings of a lifetime Hemel resident who is concerned about the town's future. However, I trust that all of the above comments will be reviewed and taken into account and not ignored as they do not follow the comment format the Plan document uses.

Included files

Title Question: Any other comment

ID EGS5767

Person ID 1264740

Full Name David Moore

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I will include all my comments in this section rather than jumping around all the other areas of this website.</p> <p>It is my understanding that we live in a democracy, not a dictatorship. However one could be forgiven that the present administration at Dacorum Borough Council (DBC) is acting exactly in the manner of a dictatorial regime in the manner in which it has undertaken this whole process.</p> <ul style="list-style-type: none"> The first and most obvious question is why in the midst of a global pandemic (First lockdown commenced on 23rd March 2020) DBC decided that it was appropriate to carry out a consultation process on a plan which proposed that plans be approved across the Borough for 16,899 new dwellings, a huge figure. <p>The British Prime Minister has described the Covid 19 Pandemic as “the worst crisis to hit this country since the Second World War”. Yet DBC considers that it is proper and sensible to carry on with this process while we face this crisis.</p> <p>In addition to this no account appears to have be taken of the change of the view of the Government in the way in which the planning process nationally will take place in future.</p> <p>In November 2020, the Conservative MP Robert Jenrick, Secretary of State for Housing, Communities and Local Government announced that future planning would be altered so that more weight would be given to building away from the South East corner of the UK in line with the “levelling up” policy of the Government. It would appear prudent for any sensible local authority, mindful of not incurring unnecessary expense, at that point to have suspended the Local Plan process whilst awaiting clarity from the government on what would be required in terms of development in the future as it is apparent that the target set by the government will quite clearly no longer be 16,596 dwellings. Why any Local Authority would carry on regardless is beyond comprehension, particularly when you add in the COVID-19 factor.</p> <ul style="list-style-type: none"> Secondly, in its handling of informing the public about the existence of the Local Plan, one has to raise the issue of whether DBC is merely incompetent, or has deliberately adopted a policy of letting as few people as possible know about it. <p>As I write this, it is Sunday 28th February 2021-</p> <p>I have received absolutely nothing from DBC to inform me that there was a local plan and that they were very keen to have my views on it.</p> <p>Yet I have been paying DBC council tax at my current address for 34 years. My up-to-date email address is linked to my Council Tax Account. They have my mobile phone number. I have been on the Electoral Register for the same time. They empty my bins every week.</p> <p>Yet, DBC cannot write to me, put a leaflet through my door, send me a text message or an email to let me know about this plan.</p> <p>How many other residents are in the same position?</p>

- Thirdly I am concerned that DBC have deprived many residents of their democratic right to have a say in this consultation process.

Without access to IT and the capability to use it many people have effectively been excluded from having their voice heard.

The “virtual” presentation room says that documents can be ordered to view from local libraries.

This consultation appears to have been launched on the 27th of November 2020 and extended until 28th February 2021.

That is 89 days. Taking into account lockdowns and Bank Holidays there appear to have been 19 days when my local library has been open.

When the advice from the Government since 5th January 2021 has been

- ***shop for basic necessities, for you or a vulnerable person.***
- ***go to work, or provide voluntary or charitable services, if you cannot reasonably do so from home.***
- ***exercise with your household (or support bubble) or one other person, this should be limited to once per day, and you should not travel outside your local area.***
- ***meet your support bubble or childcare bubble where necessary, but only if you are legally permitted to form one.***
- ***seek medical assistance or avoid injury, illness or risk of harm (including domestic abuse).***
- ***attend education or childcare - for those eligible.***

going to the library to obtain consultation documents does not appear to be a justifiable activity.

Location of Proposed Developments in Northchurch

The proposed sites between Bell Lane and Darrs Lane are totally unsuitable because of

- 1 Restricted access roads (single track/no passing places)
- 2 Already congested side roads and around shops on Northchurch High Street with limited parking space.
- 3 Loss of wildlife habitat and green space

Site off New Road to north of canal

Completely unsuitable for Housing development

Because of

- 1 Emerging traffic onto restricted width road close to Primary School with single track canal bridge
- 2 Loss of wildlife habitat and green space

It appears that that no Traffic Survey has been carried out in relation to these proposals which I believe is a requirement.

If one assumes an average of 2 motor vehicles per dwelling, for Berkhamsted that is at least an increase of 4472 vehicles on a daily basis trying to negotiate the already congested streets, adding to pollution.

I also understand that no wildlife habitat survey or archaeological survey has been carried out around Northchurch and that these are also requirements.

I urge DBC to listen to these real concerns and delay this process until after the pandemic is over which will give time to allow meaningful consultation and take into account how the change in government guidelines affects the building targets set for local authorities.

Included files

Title Question: Any other comment

ID EGS5780

Person ID 1263239

Full Name Robert Farrer

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

1. Process and consultation.

Becoming informed of the necessary level of detail to respond to this plan involves and huge investment of time and research effort. Very few Dacorum residents will have the time and hardware necessary to respond in the way expected. Most of our neighbours were completely unaware of this most significant strategic document.

In normal times, such important changes as proposed here, would be discussed in Council Chambers and public meeting rooms. The Covid pandemic has rendered public discourse almost impossible. Zoom meetings between the tiny proportion of informed and technically competent individuals is no substitute for proper public debate and scrutiny. We were unaware that there was a booklet produced by the Council outlining the proposals until late February and as far as I know, no one in Dudswell received one. This has led to a late flurry of interest in a most important plan which will affect us all.

No doubt the Council will assume that people who don't reply are content with the suggested changes. This assumption would be false. Everyone I have been in touch with is distressed by the enormity of these intended changes.

This response cannot hope to summarise all my feelings and comments about this massive document. In short, my opinion on most of these matters is congruent with that of the One Voice Alliance and I fully support their submissions.

Finally, the Plan was drawn up long before the present government's stated aim of 'levelling up' provision of housing, employment and services between the North and South of England. If this Government plan comes to fruition, the starting assumptions which informed the DBC plan will no longer be valid.

Included files

Title Question: Any other comment

ID EGS5784

Person ID 1264054

Full Name EMMA CAVE

Organisation Details Tring Youth Council

Agent ID 1264052

Agent Full Name EMMA
CAVE

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION ANY OTHER COMMENT comment

I am providing comments on behalf of Tring Youth Town Council of which I am the Clerk

Young people are very concerned at the extent of planned housing in Tring. The fact that so much green belt land will be destroyed goes completely against the Council's commitment to climate change goals. This vital environment is critical to our future sustainability.

The completely out of proportion amount of housing for Tring (55%) compared to other areas of Dacorum does not make sense. We simply do not have the infrastructure and road layout to support this many new families. We already struggle with doctors appointments and school places and parking is just hopeless already.

We would definitely want to see that enough truly affordable housing is introduced so that young people have a chance to stay near family in the area they grew up. The cheapest house on the LA5 development is £400,000!

We are not saying that Tring should have no new housing just a proportionate amount to the existing number and certainly a fairer share of the whole number for Dacorum

With regard to retail we think that there needs to be more emphasis on the High Street and improving this and filling the empty units we have now. The Auction Rooms and Museum bring lots of people into Tring who use our shops and restaurants and this would be lost if these are replaced with a supermarket of which we already have two. The Auctions have historically employed young people in their first jobs and in our view play a hugely important part in recycling and affordable furniture for young people.

Thank you

Included files

Title Question: Any other comment

ID EGS5793

Person ID 1264473

Full Name Jane Read

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I would draw attention to the lack of adherence to principles of democratic accountability and transparency – who identified the site at Long Marston? What was the input from developers? Why have local villages which would be significantly impacted by the development not been informed at an earlier stage of the the proposal? Residents of Wingrave were only made aware of the proposal on Friday night, February26th - two days before the deadline for comments
Please exclude this site from your Local Plan given the extensive evidence of its unsuitability on so many grounds.

Included files

Title Question: Any other comment

ID EGS5795

Person ID 1264749

Full Name Amber Cave

Organisation Details	
Agent ID	1264736
Agent Full Name	Amber Cave
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>55% more housing using green belt goes against DBC Climate change goals. The number of houses is disproportionate to other areas of Dacorum and our roads and infrastructure will not be sufficient.</p> <p>When planning the development there must absolutely be truly affordable housing for young people to be able to start on the housing ladder. We are being pushed out of the area in which we grew up.</p> <p>The proposals to move the Auction rooms and museum are shortsighted as these bring people to the town who then use our high street shops and restaurants. A better plan would be to help the high street thrive before expanding at the cost of 2 well established and historical businesses. By moving a historical part of the town it goes against the towns conservation and history. As a young person this is important to keep in tact.</p> <p>There is no mention of how the town will evolve in the governments plans for electric car use. We would need the infastructure to uphold this which with these many homes we would not be able to cover.</p> <p>I believe more needs to be done to keep the current community and those who have grown up here in the town thriving rather than pushing to make it bigger and less market town orientated. I would push for the younger generations to be considered more in these plans as they afterall will be the people affected most by these plans and changes to their home town.</p> <p>We need to keep the history of tring in mind whilst growing as a community.</p>
Included files	
Title	Question: Any other comment
ID	EGS5796
Person ID	1264751
Full Name	Simon Strong
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I fully endorse the Chiltern Countryside Group's submission "Chiltern Countryside Group response to Dacorum Borough Council's Local Plan Emerging Strategy for Growth 2020-2038".</p> <p>Due to the many restrictions introduced in response to Covid-19 many residents have been unable to engage with this consultation process. The consultation has therefore failed to satisfactorily meet consultation principles</p> <p>I am unable to support the DBC Local Plan 2020-2038 and therefore request that it is withdrawn.</p>
Included files	
Title	Question: Any other comment
ID	EGS5803
Person ID	1144878
Full Name	Mr Peter Moore
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS5839
Person ID	1263561
Full Name	Alexander Bhinder

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I question the level of security surrounding the completion of this form. I had to telephone DBC because despite registering, I received no e-mail confirming my registration. I tried to reregister again but of course the username I had chosen was already taken (by my previous attempt to register). Fortunately, I was able to talk to someone who helped me and more importantly, this happened before the weekend that the consultation was to end. My wife was not so lucky.</p> <p>With almost a terabyte of data, I consider the amount of information residents are expected to digest, is simply too much. Many of us are working people and do not have the time to properly evaluate all that is being presented.</p> <p>During the grip of a devastating pandemic, many are unable to give this the attention that it duly deserves. With a staggering increase in unemployment, a shocking death toll, virtual house arrest for many, I am not at all sure that the consultation should have taken place at this time.</p> <p>I understand that the consultation is open to everyone and anyone. Those taking part, do not have to be Dacorum residents. I understand that even developers can participate. When one of sales the pitches for new homes in Dacorum, is that we need to commit to provide housing for our children, then it would be reasonable to ask why non-Dacorum residents and developers form outside of the area can take part in this consultation.</p> <p>I understand new homes quotas are being directed from central government and that DBC, like other local authorities, has no say in the demands and figures it receives. I would however, question the substance behind these figures and also, just why the figures are so high for the South East.</p> <p>Unfortunately, I have not had time myself to say all that I would have liked. The deadline for the consultation is today. I have only touched on my full opinions.</p>
Included files	
Title	Question: Any other comment
ID	EGS5862
Person ID	1264768
Full Name	Paul Shepherd
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Total plan is no good as no hospital nearby doctors unavailable to register with dentists impossible to access Yes we need housing but not on this s scale stripping identity of town and villages pollution and will ruin areas of natur flooding a major issue now will be so much worse if areas developed and still not enough hcouncil housing for family's or single people
Included files	
Title	Question: Any other comment
ID	EGS5901
Person ID	1264761
Full Name	Sarah Durant
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The plan is fundamentally flawed. It is a quick fix that takes a dangerous disregard to our heritage, our environment and our ecology and biodiversity. It is a massive overdevelopment, with little regard to sustainability and the urgency of the climate and extinction crises that we face. It is a land grab on our green belt, and takes little regard of the cultural, ecological and social significance of the green spaces it has identified for destruction. It plans for too many houses where there are too few jobs, and where, inevitably, it will impose a strain on overcrowded commuting links. It will overwhelm local towns, particularl Tring and Berkhamsted, and put a strain on our communties, our transport links and our local facilities. I have noticed, during the pandemic, the massive increase in people accessing our nature reserves and SSSIs. This has led to a massive deterioration to our footpaths, with some areas becoming a complete mudbath, and with consequent large scale impacts on our biodiversity. While the increased interest in nature should be welcomed, it shows that our existing nature reserves and green spaces are insufficient for the demand. This proposed development does nothing to

increase these areas but will masively increase the impact on existing areas. It shows an appalling lack of regard for our ecology and our biodiversity.

The plan must be thrown out and completely rethought, building on our experiences through the pandemic. The world has changed, this plan must change too.

Included files

Title Question: Any other comment

ID EGS5923

Person ID 1264783

Full Name Deborah Vidler

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

Overall the plan is unambitious, unimaginative and outdated, it does not offer any distinctive vision for Tring. As it stands it will completely change the character of the town for the worse and result in the loss of highly valued wildlife and greenspace.

The proposed increase in housing numbers (over 2700) are not justifiable for Tring. Numerous local groups have produced evidence on required housing numbers which should be used to push back on the government. Dacorum should be fighting to protect the things which make it so special, it's countryside and historic towns, instead of readily giving it all up to developers.

Development on the Green Belt should be an absolute last resort. If development is to happen the plan needs to be much more ambitious and determined in protecting and enhancing remaining areas and mitigating the impact on those areas which are developed.

I would like to also add a general objection to the timing and way in which this consultation has been carried out in relation to the Covid pandemic. I appreciate these are difficult times but I feel strongly that the council should have postponed the consultation until restrictions were eased to enable face to face consultation events, physical displays for people to visit and to ensure people have the time and headspace to address such an important issue.

Included files

Title	Question: Any other comment
ID	EGS5944
Person ID	1264752
Full Name	Chris Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>This is a flawed Local Plan that should be withdrawn and re done correctly.</p> <p>I would like to add that 85% of Dacorum is rural, 60% is Green Belt and 33% of the countryside is within the Chilterns AONB. Although the Local plans states that a key objective is "minimising and managing the requirement for development on Green Belt Land and the impact on the Chilterns AONB", it is clear that in their declared mission to provide at least 100% of their self-assessed housing need, regardless of the impact on the environment, infrastructure, climate change and biodiversity will cause significant harm to our local Green belt. it also jeopardises plans, currently under early stages of discussion, to potentially extend the AONB or upgrade its status to that of a National Park.</p> <p>Nearly all development proposed in this plan will be on Green Belt land. The Minister of State Robert Jenrick said on 16 December 2020 on the recent consultation (Changes to the Planning System August 2020) ... " we heard clearly through the consultation that the building of .. homes should not come at the expense of harming our precious green spaces. " on that same day the Government published a response to the recent white paper consultations and said (in reference to protected landscapes and Green Belt): "We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places."</p> <p>The Strategy fails to take into account the combined impacts of the coronavirus pandemic and recently expanded permitted development rights, both of which create many more opportunities for conversion of commercial space (especially office and retail) to residential use, and thus windfall provision of housing throughout the Borough is probably going to be much higher than estimated. Please look at regeneration of previously developed land instead of proposing to build on Green Belt.</p>
Included files	
Title	Question: Any other comment
ID	EGS5963

Person ID	1262737
Full Name	Andrew Cassels
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Increases in houses are too much: 24% increase in housing in Berkhamsted 31% increase in the Urban footprint 55% increase in housing in Tring Berkhamsted has a town centre which can't expand and can only feasibly be accessed by car from the proposed development sites. In adequate parking will result in new residents driving elsewhere with all the inherent polutyion and congestion.</p> <p>An additional 2200+ houses with minimal increase in employment opportunities and potentially a reduction if the Jewsons, BFI and Civic centre sites are developed. More commuting, more pollution, more congestions. All unacceptable these days. This plan barely nods to the enviromental challenges we are facing. Where are the carbon neutral targets and zero emission housing?</p> <p>Government imposed housing figures of 1023 per year up from the 922 in the plan, more than twice the 497 pa based on the latest 2018 ONS projections. Why?</p> <p>There is a huge amount of development on Greenbelt. This should be challenged.</p> <p>There are limited proposals to address traffic/congestion issues - just a few improvements for cyclists and pedestrians, additional crossing points, tactile paving at junctions etc and some additional footpaths along the south side of Shootersway. All very light touch and inexpensive.</p> <p>Where are the improvemnts to local employment opportunities to. reduce commuting need? Very light touch again.</p> <p>This plan looks light it is focused on 1. keeping the government happy and 2. increasing income for DBC.</p>
Included files	
Title	Question: Any other comment
ID	EGS5983

Person ID	1151388
Full Name	Mrs Aileen MCVEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03</p>
Included files	
Title	Question: Any other comment
ID	EGS5984
Person ID	1264794

Full Name	Tim Hamper
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>From my reading of these planning documents, it would appear that Site 155 (Long Marston) has been discounted and will not be going forward in the Local Plan. Assuming I have read this correctly, this is absolutely the right decision:</p> <ul style="list-style-type: none"> - the site assessed by AECOM around Long Marston is subject to prolonged and deep flooding (once again this year). It is patently unsuitable as a location for multiple housing, as huge drainage alteration capital and operational costs would be involved - the area is very rural, with no road or rail links of any size. To connect to any transport infrastructure (e.g. A41 road, or Cheddington railway station), very large investment would be required. This would involve very significant change in a completely rural area. - the area is crossed by major power lines. Again, to resite or reinforce these assets would be hugely expensive. - since the rationale and activities for the Local Plan have been undertaken, we have endured a Covid pandemic. This has changed forever the nature of work, transport, housing requirements and sustainable development. There is a very major risk that the current Dacorum planning process (specifically including the Local Plan) is out of date, and a positive hindrance to post-pandemic recovery growth. Time to rethink the entire approach, not press on with a process that is no longer fit for purpose. <p>I hope that I have interpreted these plans correctly, and that Site 155 (Long Marston) never appears in any future plan for development. It is, and will remain, wholly unsuitable.</p>
Included files	
Title	Question: Any other comment
ID	EGS6015
Person ID	1264809
Full Name	Sue Selfe
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS6031
Person ID	1264822
Full Name	JULES GARNER
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>This is the most important decision for the community in a long time. Two clear issues which mean we must consider deferring this decision for at least 2 years:</p> <ul style="list-style-type: none"> We are in a pandemic and the community and local businesses are already reeling from material personnel and financial challenges. It is simply not the right time for the community to have the time to make a decision that will impact everybody - how will a Nurse on the front line be able to respond to this now - is it fair they can't have a say? There is a housing challenge in the UK but right now it is unclear where the housing is needed post the pandemic. The data from 2018 already shows that there is no requirement for the level of housing So again not the right time to start destroying the Green Belt.
Included files	
Title	Question: Any other comment
ID	EGS6043
Person ID	1264763
Full Name	Corran Griffin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Why does Dacorum need 25% more houses/people/cars/pollution/noise/water usage and crime? Who actually stands to benefit from this expotential expansion in the existing community? Rather than trying to protect itself, the Green Belt and its residents, Dacorum is allowing itself to be used as the dumping ground/overspill area for other parts of the country.

The Local Plan needs to regenerate the local area brownfield sites, provide high quality family housing, new schools and leisure facilities and better infrastructure for the CURRENT RESIDENTS. Creating a soulless, new build dormitory town will destroy all the character of the local area. We might as well go and live in Milton Keynes!

Included files

Title Question: Any other comment

ID EGS6126

Person ID 1264836

Full Name Gemma Parker

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I have not found the review and comment process for this document simple, hence I am giving my comments here, as it not clear where else they would be appropriate.

My number one concern is the timing of these plans. It is clear that the pandemic has changed many things irreversibly. We have all been asked to put our lives on hold for the last year and it seems clear to me that any plans should be revisited once full account has been taken of the impact of the pandemic on future lifestyles etc. I believe that a lot more land in cities will be available for housing in future as less people travel to work and shop in them. The public's relationship with green land and open space has also changed dramatically and these things are more valued than ever before. It is therefore imperative that green belt land is not used for building where there are alternatives, and this should be revisited after the pandemic. The value of local community has also been highlighted by the pandemic and any development that significantly changes communities needs to be carefully considered in a way I do not feel is happening in relation to this local plan.

It is the development to the East of Tring that is of most concern to me, due to the incredibly large number of homes that are proposed which will change the character of Tring and Tring Station significantly. I am not at all reassured that the development will properly address the challenges of climate change and that innovative, cutting edge housing will be built rather than an identikit large-scale estate. The sheer increase in volume of people in the area will have a significant detrimental impact on enjoyment of the greenspace and AONB both for residents and those who visit on a daily basis.

I appreciate that Government are setting high pressure targets for housing and this comment is directed not only at Dacorum but at Government planners who I believe should also take time to take stock of what has happened during the pandemic and how this may have impacted possible solutions.

Although the strategies say that environmental and climate change impacts have been considered, it is easy to make these statements and I do not have any confidence that this is in fact the case and that it has been treated as the overriding consideration.

Included files

Title Question: Any other comment

ID EGS6128

Person ID 1264845

Full Name Katherine Hall

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* **Yes**
* **No**

QUESTION ANY OTHER COMMENT comment

The consultation has been pushed through in the midst of a pandemic and insufficient time has been given to people to be able to properly consider and provide feedback on respect of the local plan.

The overall level of housing proposed to be built in Dacorum is disproportionate. Much of Dacorum is green belt and therefore such a large housing target puts a significant strain on this borough.

the green belt exists to prevent development, preserve countryside and to stop urban sprawl. As a result of these housing targets and the proposed plans (I note in particular the west Hemel area, existing development between there and Bourne end, and then the proposed areas being removed from green belt to extend Berkhamsted) will effectively lead to ribbon development from Hemel Hempstead to Berkhamsted, particularly if the Thakeham Bulbourne Cross proposal gains traction.

Whilst building homes is important given the issues with housing stock, it must be genuinely affordable and not development of 'executive' 4 bed homes. And it must be focussed on regeneration and urban space and NOT in the green belt. Backed by infrastructure required-many towns of similar size to Hemel have intercity train services, theatres, music venues, much better community facilities. It makes sense for Hemel Hempstead to have the majority of the burden of new housing. But Hemel simply does not have the infrastructure to support. We have virtually no cultural centres for the community eg a major theatre. Sports facilities are at high capacity. Many of the new houses will have commuters. Our train service

is appalling, has low capacity, and only 'slower' trains these days. Traffic in town and in Boxmoor is increasingly difficult. The plan does not effectively deal with the infrastructure and community and cultural centres needed to support such a significant population increase and infrastructure burden.

The problem in Berkhamsted is worse. Traffic in town is awful and the new development areas being proposed will add significantly to traffic and congestion through the high street and london road to Bourne end and Hemel.

The Thakeham proposal being touted (which I note is not in this consultation but the developers are pushing hard) is completely unacceptable. It will merge Berkhamsted, Bourne End and Hemel. It has significant loss of green belt. Valuable community sports facilities currently in town and easily accessible will be lost and sited almost in Hemel! Everyone will have to drive to it causing pollution. It is simply not sustainable development. The local authority should instead focus on how to improve community facilities and sports facilities within town itself.

Included files

Title Question: Any other comment

ID EGS6160

Person ID 1145998

Full Name Mrs Pauline Hughes

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Too much to consider in one go.

Included files

Title Question: Any other comment

ID EGS6163

Person ID 398747

Full Name Mrs Lindsay Hardy

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	In addition, the process to respond to your proposal can not be considered easily accessible, rather it is onerous. There are pages of information to trawl through and yet virtually impossible to access a form to respond to your proposal. It is only because of the work of 'Tring in Transition' that it was possible to access this form, despite many attempts through your website. This is not in keeping with your own aims of "remove barriers and improve access". Quite the opposite.
Included files	
Title	Question: Any other comment
ID	EGS6175
Person ID	1264871
Full Name	Julia Williams
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The addendum suggests a new settlement at Long Marston (155L). Yet it does not address the many apparent problems with the location and I strongly object to development on this site <ul style="list-style-type: none"> - it is virgin unspoilt countryside in a peaceful rural location populated only by small villages and farms. This development would ruin the area. Some areas need to remain undeveloped to as to maintain some rural heritage and character. - the site would be highly visible from the surrounding area and would destroy the rural view from the top of Ivinghoe Beacon - the area is a flood plain and is very wet and would potentially have drainage issues - there is no road infrastructure only small country lanes that could not cope with the increased traffic of such a development

- parking capacity at cheddington station is small and parking on the road is already a problem. Train service is irregular, as is the local bus service. The local roads are not suitable for the passing of many large vehicles such as busses
- there must be many more suitable sites better connected to the road networks and local towns with much closer access to the A14 and in areas already spoiled by development and roads in the Tring Berkhamstead and Hemel Hempstead area.
- the A41 is already at capacity and with up to 30 min queues to join the M25 some mornings. Additional traffic will make this worse. How would this be addressed?
- Valuable ancient hedgerows and the wildlife habitat would be destroyed. There is an abundance of wildlife whose habitat would be destroyed
- the parish name is Tring Rural. But it will not be rural any more with such a development.
- there are no schools shops or medical facilities in the area to support such a development

Included files

Title Question: Any other comment

ID EGS6193

Person ID 1264838

Full Name Susan Milligan

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I totally get that this is a massive Housing Plan and to compile a consultation exercise is complex. However as a lay person I have found it extremely difficult to access this site and to find the appropriate place on which to make my comments. All I really want to say is that Green Belt Land should not be used for development and therefore the plan should be amended. The Plan will waste acres of farmland and cause permanent damage to the Chilterns Area of Outstanding Natural Beauty.

Included files

Title	Question: Any other comment
ID	EGS6231
Person ID	1261819
Full Name	Alex Rathmell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	
Included files	

Title	Question: Any other comment
ID	EGS6233
Person ID	1264902
Full Name	Caroline Tyer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The proposed new housing development for Tring is disproportionate to the size of the market town. A lot of the proposed development is on green belt land. It would completely change the character and nature of the town and put excessive pressure of the current infrastructure and service of the town. We object.

Included files	
Title	Question: Any other comment
ID	EGS6287
Person ID	1264867
Full Name	Corinne Fleming
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS6298
Person ID	1263462
Full Name	Bourne End
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	In light of lockdown for a considerable length of the time in which this consultation has taken place, we feel that our little community has been deprived of proper information and guidance. There are: elderly residents who do not access the internet for information, if indeed they even have broadband; families home schooling with access to IT focussed on the

children; working from home and furloughed as well as essential workers all thinking about Covid now not planning for next summer let alone years ahead.

Low levels of response should be taken as low levels of information and the public voice is not fairly represented by some areas having better councillors than others.

Our neighbourhood network has been unable to bridge the communication gap as no public exhibitions or information displays such as at libraries have been available. No local authority leafletting has been distributed, in fact the most prominent planning communications have come to Bourne End from Thakeham mailshotting for support to come forward as an alternative site for housing with out of town sports facilities which they claim is for the benefit of Berkhamsted, forgetting that it is to the detriment of Bourne End. Our community is united in opposition to Thakeham, it is divided in its attitude to Dacorum as protector of this small community in the green belt countryside buffer between Hemel Hempstead to the East and Berkhamsted to the West, with the large village of Bovington at the top of the hill to the South and the canal, railway and farm land to the north.

Included files

Title Question: Any other comment

ID EGS6302

Person ID 1264834

Full Name Ilina Jha

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment The proposed developments will encroach on the Green Belt - an alarming prospect given that we are facing a climate crisis. The large increase in population will affect the historic character of Tring. The council should focus on tackling the climate crisis in the Borough and think about how existing buildings can be made more environmentally friendly.

Included files

Title Question: Any other comment

ID EGS6355

Person ID	1264946
Full Name	Shaun Pope
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The level of wider public engagement and consultation from 2017 to 2021 has been lacking and therefore Dacorum Local Plan 2020-2038 will not reflect the views of local residents and businesses.
Included files	
Title	Question: Any other comment
ID	EGS6444
Person ID	1264959
Full Name	Neil Fraser
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I wasn't aware of this plan until my mother told me about it today. I live in Grovehill and haven't had any leaflet drops about this plan. So I haven't time to read and comment on the plan fully. I am not happy that you are getting rid of beautiful countryside and replacing it with houses. How can you build on greenbelt? How is this allowed? Grovehill is high density and what makes it a nice place to live is all the countryside on our doorstep. With the new developments it is going to become more like an inner-city area. Who is going to be able to afford to live there anyway? I'm a homeowner and would not be able to afford to move to a more expensive property (the ones that are still for sale at Upper Bourne End are over £500,000 and other new homes in Dacorum on infills are even more expensive). Wages are stagnating and with taxes, either income or more hidden, likely to rise to pay for the pandemic who will be able to buy the houses

that are not 'affordable'? I have been working from home during the pandemic and am likely to be able to at least do some of my work from home after the pandemic. Therefore, a move away from Dacorum to somewhere cheaper (for example Bedfordshire) and less built up would make more sense, than buying what is likely to be an overpriced new home in Dacorum. I get the impression that Dacorum is wanting the developers (and in effect the purchasers of the non-affordable new houses) to pay for new infrastructure even where this infrastructure will benefit existing residents as well as new ones. This doesn't seem fair and will make the homes more expensive.

Included files**Title** Question: Any other comment**ID** EGS6447**Person ID** 1264928**Full Name** Nicola Simpson**Organisation Details****Agent ID****Agent Full Name****Agent Organisation****Yes / No** Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I strongly object to the DLP where there is a loss of any greenbelt involved. Surely the last year of Covid has demonstrated how important our natural open spaces are to our physical and mental health. This cannot be depleted or engineered with any positive impact on the areas involved.**Included files****Title** Question: Any other comment**ID** EGS6455**Person ID** 1264750**Full Name** Neil Joyce**Organisation Details****Agent ID****Agent Full Name**

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Whilst I appreciate that this plan was written prior to the pandemic, I feel strongly that there are large swathes of it that should be re-addressed in light of it.</p> <p>I believe that the largescale proposed developments for Tring will impact the AONB due to the visual incursion into the greenbelt. They will also alter the character of the town from a destination of choice for visitors and residents to a homogenous southern English dormitory region.</p> <p>The plan does no take into account the largescale building programmes in nearby Aylesbury, Aston Clinton and Pitstone, or the available business sites on the Castlemead development.</p> <p>It seems to have been written by a team that have no local knowledge of the uniqueness of Tring and it's totally differing character to Berkhamsted, yet they are both described as 'Market Towns'.</p> <p>Please revise the plan sympathetically to the historical towns and not give in to national demands.</p>
Included files	
Title	Question: Any other comment
ID	EGS6483
Person ID	1264969
Full Name	Gregg McAlister
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Given that the government policy has changed significantly during this consultation period and is now geared towards city regeneration I believe these proposals are now completely at odds with current policy and that Dacorum needs to go back to the drawing board taking into account new national policy.
Included files	

Title	Question: Any other comment
ID	EGS6498
Person ID	1145686
Full Name	Mrs Sarah Gray
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>This portal itself seems to have been designed to hinder people from commenting on the plan. It is ridiculous to have had this whole planning consultation in the middle of a pandemic and I am sure that many members of the community are unaware that it is even taking place. Also as sites are constantly put forward for development even when they have been previously turned down there is a sense of inevitability.</p> <p>The council should be trying to preserve the nature of the borough with its rural "small" market towns, and improve services and conditions for current residents.</p>
Included files	
Title	Question: Any other comment
ID	EGS6510
Person ID	1264966
Full Name	Lynne Magennis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	My comment specifically addresses the carefully hidden appendix which states that the Council independently put forward a proposal to build 3800 homes close to Long Marston as one of the options within the plan. This proposal clearly runs roughshod over ALL of the aims and themes put forward in this vast document and seeks to destroy an area clearly part of the overall beautiful landscape to the west of Tring. The only compelling reason for the proposal appears to be the lack of other suitable sites for a large scale development of this nature and the scale of the proposed plan is indeed vast, covering an area equivalent to Long Marston, Puttenham, Astrope and Gubblecote COMBINED. 3800 homes equates to some 10,000 people coming and going to and from an area poorly served by roads, accessible mainly over small, single track structurally unsound canal bridges, most of which would require expensive and extensive work to expand and strengthen. Currently the area is poorly served by public transport with few buses traversing very minor roads and an unmanned station a long and hazardous cycle ride away. The current footfall in the main amenity areas of Ashridge Forest, Tring Reservoirs, Tring Park etc is already having a hugely detrimental effect on the sites and a significant development in this area would make this situation very much worse very quickly. I hesitate to even mention the existing flooding problem in the local area, Long Marston being underwater for most of the winter 2020/21 both in the village centre and the surrounding fields which even as I write are still awash. As another commenter has said, this world post the Covid pandemic is very different to the one you saw when this plan was conceived and the changes in the way our world operates must be taken into consideration and a new plan conceived based on the reality of today rather than yesterday, we as a nation work and live very differently now and most sources agree that this will continue to a large extent so our living/working strategy has to reflect that.
Included files	
Title	Question: Any other comment
ID	EGS6511
Person ID	1264984
Full Name	Jason Bennett
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The plan as presented responds in a flased manner to government policy that has since changed. Dacorum should also have changed its strategy.

The plan is for far too many houses and in the wrong locations. Focus on massive development on primarily green belt areas is misguided at best, fits the ease of developers but incurs lasting harm to the environment around Tring.

A massive increase in excess of 50% housing capacity is harmful and will overwhelm Tring (and Berkhamsted). Not only facilities but the very community, the people, will be overwhelmed by such a massive increase in short time frame. All while responding to out-dated requirements.

The areas include examples of rare chalkland streams, wastes acres of farmland and damages the Chilterns Area of Outstanding Natural Beauty. This legacy will not benefit the next generations but instead serve as an example of poorly thought out policy and execution on a scale even greater than the 1960's and 70's rush to concrete high rise developments so disparaging and poorly thought of now.

There are too few local jobs to accommodate such a massive increase in population. Even with increased work from home policies that may emerge from the current Pandemic this cannot support such a massive population. This will increase pressures on the community and individuals, not ease them.

By straining the natural eco system, negatively impacting the Area of Outstanding Natural Beauty, straining local infrastructure, stress on local economy amongst other negatives the plan is harmful, not sustainable, poorly thought through. It responds to policy since changed. It is flawed and should be re-considered before lasting harm is done on so many aspects to so many people.

Included files

Title Question: Any other comment

ID EGS6514

Person ID 1264951

Full Name Chris Perks

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment The Plan, particularly in relation to Berkhamsted / Northchurch / Tring, seems to largely disregard the impact on people living in those areas and the reason they choose to do so, namely: access to open space; surrounding green belt land; a reasonably balance of housing density. It also ignores the impact on already strained infrastructure and services.

Infilling areas of green space will forever change the nature of this borough for the worse, and the number of houses proposed in already congested towns will radically reduce the quality of life for existing residents.

The Strategy proposes that substantial areas of the Green Belt around Hemel Hempstead, Berkhamsted and Tring alongside the AONB boundary should be allocated for housing. I understand that this is contrary to national policy, the Strategy's own policies, and both the Chilterns Conservation Board (CCB) Management Plan 2019-24 and its Position Statement Development Affecting the Setting of the Chilterns AONB (2011, revised 2014).

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

Included files

Title Question: Any other comment

ID EGS6520

Person ID 1260255

Full Name KTB Commercial

Organisation Details

Agent ID 1260252

Agent Full Name Peter Biggs

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Local Plan has directed allocated sites to the major towns within the authority and specific selected villages including Kings Langley, Bovingdon, and Markyate. This approach, severely limits the opportunities for new development within other villages that have sustainable credentials that could support small/medium development sites and SMEs.

It is therefore proposed that the site at Rainbow and land north of Rainbow should be considered for allocation of up to 10 dwellings, and included within the list of Appendix 2 – Identified Small Housing Sites (<1 Hectare). Not only would this promote a small/medium size site that would support an SME development, but it is a highly sustainable location

within Piccotts End, near to and with easy access to Hemel Hempstead to the south and with potential links through to the proposed Hemel North.

In conclusion

This letter has set out a response to the policies proposed in the new draft Local Plan, and particularly highlights that to be consistent with national planning guidance within the Green Belt, Piccotts End should be defined as a village within which limited development is allowed in principle.

This letter also makes a case for extending the settlement boundary to include Rainbows and land to the north of Rainbows, Piccotts End Lane, and to identified this site as a housing allocation on the Proposals Map and within Appendix 2 of the new Local Plan for up to 10 dwellings.

Included files

[Rainbow, Piccotts End Lane location plan.pdf](#)

Title

Question: Any other comment

ID

EGS6529

Person ID

1264958

Full Name

Peter Marshall

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I appreciate the need for a strategic plan and commend the amount of work which has gone into it.

I question the fundamental estimate of housing need. There seems to be no consideration of any deviation from the number of homes required. I would like to see what is planned if the requirement is, say, 20% greater; and which homes would not be built if the need diminished i.e. some contingency planning.

I am not clear that the effects of covid-19 on behaviour in the borough has been thought through when I read for example that Dacorum needs additional retail space. Are we really expecting the movement of retail sales from the High Street to the internet to be reversed?

My remaining comments are made because at this stage the Strategic Plan does not provide detailed answers. As an inhabitant of South Berkhamsted I worry about the following:

- i) The amount of traffic along Shootersway which has already grown with the original Bearroc Park development and is bound to increase still further as the second stage is completed.
- ii) The plan states that open space will be provided and existing trees retained. With housing running the entire length of the A41 from Darr's Lane to Northchurch Lane (and beyond) it is difficult to see how the existing greenery can be maintained.
- iii) The closure of the foot crossings of the A41 have already extended the distance of any circular walk along NC21 and 22 from Berkhamsted. During lockdown Shootersway has been much used for exercise. With housing as far as Darr's Lane and heavier traffic walking on the North side of the A41 will become unpleasant.
- iv) I understand that Dacorum Borough cannot directly provide most types of infrastructure. However I am concerned that primary health care in particular may not be sufficient if the proposed number of homes are really required. Conversely I wonder if the educational infrastructure sites might not all be required. I hope that coordination between the various bodies is effective.
- v) I note that you have provisions in place to reduce flooding risk. I just hope they are sufficient when even now water running east along Shootersway can flood garages. With concrete covering the slope down to the Rossway land large quantities of water will have to be moved away quickly.

Included files	
Title	Question: Any other comment
ID	EGS6596
Person ID	1265011
Full Name	Rebecca Staples
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I just feel that the plans submitted are so wrong for Tring! The high street has been diminishing for some time with many outlets closing, there needs to be a real push from the council to encourage people to come and visit the town for leisure purposes - parking is needed for this as mentioned before. There is already so much building work on the outskirts of

the town, I think an in-town development in addition to further development on green belt land will start to rip the heart out of the pretty market town we love.

Included files

Title Question: Any other comment

ID EGS6645

Person ID 1265007

Full Name Duncan Brown

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No
* Yes
* No

QUESTION ANY OTHER COMMENT comment

Included files

Title Question: Any other comment

ID EGS6672

Person ID 1227391

Full Name mrs caroline shaughnessy

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION ANY OTHER COMMENT comment	<p>Air quality management areas (AQMAs):</p> <p>Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines. <i>(National Planning Policy Framework, February 2019)</i></p> <p>This Cannot be ignored just because "not likly to achive objective" It should be met and developing in and around Lawn Lane/ Ebberns Rd / London Road its making it worse , how were these developments passed knowing there was a AQMA. With the incease in development across Hemel Hempstead There needs to be greater infrustructure to divert traffic from St Albans Hill/ Lawn Lane into Apsley/ A41 The Junction at Lawn Lane Belswains Lane is at the point of the AQMA as it stands and is a very dangerous junction (inadequatly marked) I have CCTV evidence of approx 15 near miss accidents a day at that location. With the development it cannot cope with an increase in traffic. The lights manamgnet system in Durrents hill road causes a back up of traffic into Lawn Lane now, so its going to be gridlock with increase in traffic to the retails areas in Apsley. A new route needs to be considered or relocation of the retail area with access from a major route not a residential road- this could be used for residential and as it is near town and railway and the new proposed cycle and walkways may decrease the traffic use along the forementioned routes.</p>
Included files	
Title	Question: Any other comment
ID	EGS6679
Person ID	1265045
Full Name	Joanne Loch
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am also very concerned that many of us have been unaware of the full extent of the situation, and if they knew would be equally as appalled. People have not always got the time, energy, or means to stand up against such political decisions. Yet this seems even more under-hand as this has been pushed through during a time of national pandemic, when people have been asked to stay at home, shield, isolate and are generally suffering the blow to both physical and mental health. Communication means have not been normal and we have all had many other concerns to face during this period. This feels as though things are moving forward with very little consultation, as during this year of pandemic, people have needed to focus on problems within their own households, not having the ability to socialise and therefore learn of the</p>

local news, and no time to research into any rumours that we might have heard about proposed building. This is not giving residents of Northchurch, Berkhamsted and Tring and surrounding areas enough time nor ability to respond.

I want to know exactly how many acres of Greenbelt land would be lost, and how much our population would increase. There needs to be honesty and transparency in these proposals, and the opportunity for each and every resident to have their say.

Please can you reconsider this proposal for development and look at the impact on your beautiful towns and villages and the people that live in them.

Included files

Title Question: Any other comment

ID EGS6703

Person ID 1265033

Full Name James Heath

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment This form has been very difficult to complete. Almost impossible at times. I have spent hours just completing the comments I have managed to make and all are not in the correct boxes, due the poor way in which this form works. Could I request that in future alternative methods of replying to consultations are easily accepted. It feels as though by making this such a hard process, fewer people will respond!

The boxes do not allow you to scroll through them and edit your comments.

The word limits for a box mean all comments cannot be made.

Included files

Title Question: Any other comment

ID EGS6750

Person ID 1264923

Full Name Ken Douglas

Organisation Details	Secretary TRING IN TRANSITION
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I've reflected many times on the content of this Plan.</p> <p>Each time my sense that it lets the residents of Tring down increases - although I'm aware that it is incomplete and also the pressures the Planning Dept is subject too.</p> <p>However I have to conclude that it feels rushed and far from complete. The underlying numbers are really not justified and the associated plans for how to protect what makes Dacorum distinctive are sorely lacking in vision and ambition. A Local Plan should be something aspirational that most of the people of the Borough can stand behind....and it is not there. Furthermore I cannot see how there is enough time for the limited resources to process all of the feedback and respond properly.</p> <p>I'd like to propose that DBC adopt a different approach going forward and find a way to engage with local organisations to working towards the Section 19 version. As a minimum I'd like to see visibility of the next steps.</p> <p>We have already submitted much of our commentary in electronic form, however we encountered several issues with formatting and so have consolidated <i>all</i> of our comments, and additional material, in the enclosed PDF.</p> <p>We have reviewed the Local Plan and supporting materials thoroughly and have a number of serious concerns. In attempting to accommodate vastly increased (and unjustifiable) housing numbers it fails to meet its own stated objectives, uses flawed assumptions in several places, and is disappointing in its lack any real 21st century vision. We have referenced why we reached these conclusions in the attached.</p> <p>In addition, throughout the process we have engaged not only with our core membership but with over 3500 people (through online presentations, downloads of our materials etc.) and have found they <i>all</i> share the same concerns.</p> <p>Finally, through collaboration and discussions with other organisations, we also agree with the common position held by the <i>Chiltern Society, Chiltern Countryside Group (CCG), Grove Fields Residents Association (GFRA), Berkhamsted Residents Action Group (BRAG), Kings Langley & District Residents Association (KL&DRA), Berkhamsted Citizens Association</i> and others forming the 'One Voice' Alliance, to oppose the Local Plan because:</p> <ol style="list-style-type: none"> 1 Whilst the policy on biodiversity is clear, the emerging plan is not explicit enough in terms of how Dacorum Council will work with developers and other stakeholders to mitigate Green Belt loss, increase biodiversity and meet National and Hertfordshire's goals for climate change and carbon reduction

- 2 The proposed number of houses to be built should be significantly lower than the target to reflect **actual demonstrable need** for housing and the high proportion of Green Belt and AONB land in Dacorum, with a primary focus on affordable starter homes
- 3 A higher proportion of the houses should be built on brownfield land, or established through conversions, in the existing urban areas of Hemel Hempstead, Tring, Berkhamsted and Kings Langley, and **away from areas located in the Green Belt** (which should only be used in exceptional circumstances) and the Chilterns AONB and its setting.

Give the enormity of the gap between the draft Plan and where it needs to be, and the relatively short time period to address these, we are prepared to help DBC constructively in the coming months and will be in touch separately in order to explore how best this might be achieved.

The Plan, for reasons that are not clear, conveys a message that growth far in excess of that necessary, along with the significant loss of Green Belt, is a *fait accompli*. This is in stark contrast to previous versions of the Plan and is not aligned with the clear wishes of the vast majority of the Borough's population.

Despite many welcome, positive intentions expressed in the Vision and Strategic Objectives, the Plan feels – at present – more like a 1980s', developer-led charter than a guide appropriate for the 21st century.

We believe that Dacorum would be strongly supported by its populace if it grasps the opportunity to make a few significant and bold changes. Many local groups would be willing to share the workload.

In particular, there is scope to be bolder: presenting evidence to push back on Government targets, being less reliant on developer proposals; and recognising that the role of a Local Plan should be as much about the proactive development and protection of our natural environment as it is about developing and enhancing our built environment.

The real reasons for the excessively high housing growth numbers in the Plan are not explicit – especially for Tring where the relative increase is almost three times higher than the next most impacted town (and this in an area which, even according to presented evidence, is least well suited to such an increase in terms of adverse impact on the environment).

The proposed numbers are already in excess of that required by the Government. We would point out that Dacorum Council is well within its rights to push back on these numbers (even if they are reduced significantly) when it can be shown to result in inappropriately high impact on other important measures. We have touched on many of these earlier in our response.

If the numbers were driven by calculations for generating a required level of CIL income (e.g., the notion that excessive extra houses have to be built in Tring in order to fund a new secondary school - which is only required because we are building so many new houses) then these assumptions need to be fundamentally challenged. Again, if the numbers do not work out it is further grounds for pushing back on growth, NOT to accelerate it.

In the 21st century Green Belt becomes arguably more important. This was once recognised in Dacorum's own strategic planning guidelines. There is a strong case that Green Belt should, in fact, be proactively enhanced in order to help meet carbon-emission and biodiversity goals, provide the sort of wild green recreational spaces that are increasingly in demand, and also provide economic growth (recognising that Dacorum – and especially Tring – is increasingly becoming a green 'destination' space).

There is virtually no evidence that this perspective on Green Belt has been acknowledged or understood by the authors of the Plan. This need to be urgently revisited.

The need for ‘distinctive’ development is mentioned several times in connection both with the natural and built environments (e.g., ‘*All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place.*’ – Overarching Vision, page 22).

It is not clear how this will be either defined or agreed for Tring, which is arguably the most distinctive settlement in Dacorum in terms of natural setting, social and economic history. Neither is it clear how this will be given ‘teeth’ in order to proactively shape development.

In the absence of a working definition, Tring in Transition has created an initial description of what makes Tring distinctive to help shape what we would expect to see in the final version of the Plan. This highlights our unique heritage and location, including:

- A Rothschild legacy of forward-thinking development, respect for the environment, bold and challenging designs and solutions
- A strong heritage of local renewable energy with significant wind and waterpower
- A location surrounded by more than 50% of Dacorum’s SSSIs, extensive AONBs, as well as extensive hedgerows and other wild places
- A service-oriented, agricultural, market legacy and a traditional destination location to visit, meet, relax and socialise

From these we have also developed four distinct ‘visions’ for improving the standard of developments in Tring. Each responds to one or more of the deficiencies in the Plan and builds on Tring’s distinctive features.

1 ‘Tring Fields’

To help proactively address any loss of Green Belt and meet NPPF guidelines to mitigate the same:

The overarching theme is that each existing field will provide the basis of the layout of any future development. Each will have a purpose, an individual ‘personality’. This may be a cluster of housing, an informal green space, a school, a services unit or a health clinic.

By basing the development physically on the existing field system, we propose that Tring Fields will create an attractive new development in keeping with the adjoining AONB and Green Belt area in which it is built and by which it will be surrounded.

- It keeps the existing green infrastructure of hedges and field boundaries – meeting the requirement for joined green corridors and informal green spaces
- Marshcroft Lane becomes the crowning glory of the development, the central draw and attraction, remaining as a quiet lane with the proposed link road NOT cutting across it.
- The houses are built in clusters in the existing fields, each complying to high energy efficiency standards
- Each cluster will have a particular design and character (an approach already used successfully elsewhere in the UK).
- Community spirit is created by the intimate feel of the individual clusters which still remain part of a greater whole.

To address the need for growth, enhance the existing town centre and correct assumptions apparently carried over from previous planning exercises (traceable back to the 1990s).

We proposed taking a lead from existing '21st-century market town' schemes successfully being deployed in Yorkshire, Stroud etc. In summary, this includes recognising the limited need for new town centre retail space; acknowledging that central supermarkets are more damaging environmentally than those designed to limit travel and traffic congestion; and acknowledging changing employment patterns and social norms (this is especially true for Tring).

- Replace proposals for significant new retail space and encourage more food, experiential, social, entertainment and 'destination' spaces etc.
- Revisit plans for a central supermarket (which will only add to issues with existing traffic hot spots) and recognise the patterns of use from those living in villages to the north of Tring. (Depending on revisions to developments – this could well be at the Bulbourne side of towns.)
- Remove proposals for warehousing and large industrial units on the Dunsley Farm site and build on Tring's heritage as a service-oriented market town by building smaller, more flexible workspaces that reflect rapidly growing local/home-working patterns.
- Revisit plans for Tr06/Brook St: prioritise schemes fronting to the High Street, encouraging food, social and 'destination' spaces.
- Recognise that Dunsley Farm is better suited to residential home development than light industry – meeting both social and employment needs.

To address pressures on local green spaces, SSSIs, biodiversity and Green Belt loss.

The definitions of open spaces, green spaces, green buffers and wildlife corridors need to be more explicit. They are a consistent cause of confusion and question in the Plan. There is a need for all of these, but given the high number of SSSIs around Tring, AONBs, the Beechwood SAC, etc. **there is an opportunity to establish a country-leading if not world-leading scheme where defined wildlife corridors are proactively established around the entire perimeter of the town, through new developments and onwards to local nature reserves etc.**

- Implement joined-up wildlife corridors through and around all new developments
- Explicitly plan to proactively link all SSSIs via wildlife/green corridors
- Provide managed public access through a new network of
- Provide an opportunity for the various organisations managing local wild spaces (Woodland Trust, National Trust, Wildlife Trusts, Chiltern Society, Rothschild Estates etc.) to work together with the Council to design and build this. (An initial poll of these organisations indicates a strong willingness.)
- Recognise NPPF requirement that any Green Belt development requires explicit mitigation and improvement on *other* Green Belt land. (The inclusion of green and open spaces in existing Green Belt parcels earmarked for development does not count towards this.)

To address county and national carbon targets and to reinvent Tring's legacy of renewable energy use. We acknowledge statements about going beyond current government guidelines on new housing insulation. This sounds good but will already be superseded by more demanding targets before we are halfway through the term of this Plan. We are also

aware that developers have pushed back with statements like 'we don't find a market for solar panels' etc. These are, frankly, irrelevant and should be entirely disregarded.

Developments around Tring have a clear and new opportunity to embrace the highest possible standards that can be mandated (if not higher):

- All new developments built to highest possible standards of carbon neutral build and energy efficient operation.
- Renewable energy targets, inclusion of solar systems in new homes (regardless of any developer pushback) should be explicitly mandated.
- See our detailed response to SP24 etc.

Included files

Title Question: Any other comment

ID EGS6751

Person ID 1261257

Full Name Simon Tuff

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment page 32

Included files

Title Question: Any other comment

ID EGS6795

Person ID 1262984

Full Name Deborah O'Sullivan

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> As a resident of Berkhamsted, I have seen nor received anything to highlight this consultation – it took a neighbour to tell me about it. I believe that the extraordinary circumstances around the pandemic should mean that the consultation is extended further and efforts made to highlight the consultation to all interested parties. As someone who is technically literate, I found the commenting process confusing, time-consuming and hard to navigate. This will no doubt result in many fewer people commenting who are less able.
Included files	
Title	Question: Any other comment
ID	EGS6833
Person ID	1258646
Full Name	Jane Timmis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Any Other Comments</p> <p>To reiterate the following:</p> <p>The proposed number of houses to be built should be significantly lower than the target to reflect actual demonstrable need for housing and the high proportion of Green Belt and AONB land in Dacorum, with a primary focus on affordable starter homes.</p> <p>> A higher proportion of the houses should be built on brownfield land, or established through conversions, in the existing urban areas of Hemel Hempstead, Tring, Berkhamsted and Kings Langley, and away from areas located in the Green Belt (which should only be used in exceptional circumstances) and the Chilterns AONB and its setting.</p>

Dacorum Borough Council and our local MP, must challenge the Government on this excessive imposition of house building numbers that affects our Green Belt, Market towns and villages so adversely. This draft plan is not acceptable.

Included files

Title Question: Any other comment

ID EGS6843

Person ID 1265036

Full Name Tom Burrows

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Included files

Title Question: Any other comment

ID EGS6853

Person ID 1265095

Full Name Jemima Frances

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment	Trying to put this through in the middle of a highly infectious pandemic is morally wrong. It stops people being able to come to the meetings as they would in normal times. Also those not on the Internet should not be devalued, their views matter too.
Included files	
Title	Question: Any other comment
ID	EGS6895
Person ID	1265006
Full Name	Tracy Bownes
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The plans have not been adequately consulted within the communities they impact. The consultation during "stay at home" lockdown is inappropriate. Many impacted residents will not have been made aware of the consultation due to limited time out of the home, limited social contact, and the lack of "at home" notification. We did not receive ANY formal communication of this consultation - we only became aware as a result of social media. Furthermore, it has not been possible for any local groups to meet to discuss objections, as would be normal.
Included files	
Title	Question: Any other comment
ID	EGS6950
Person ID	1265112
Full Name	Tom Axon
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS6985
Person ID	1265094
Full Name	Rebecca Gurnham
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>the proposed rapid 55% housing growth for Tring is particularly shocking and undoubtedly unsustainable, especially considering commuter and local transport, amenities and infrastructure.</p> <p>The complete obliteration of the name and history of Northchurch, to become 'West Berkhamsted', shows a total lack of local understanding.</p>
Included files	
Title	Question: Any other comment
ID	EGS7013
Person ID	1263321
Full Name	TSEL Secretary TSEL
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Given the substantial role Tornadoes has in the Tring local community and the scale of our reach across the local community, we know that there are a wide range of view and opinions in the town about how, when, where and through what mechanisms it should develop.</p> <p>Within our membership, there are families who will be directly impacted by the current housing site proposals and families who would greatly benefit from increases in the number of affordable homes in the town.</p> <p>Tornadoes focus though is on securing new, bigger and better football / sports playing spaces and facilities for its current membership, now and so, whilst we acknowledge the future potential that the Local Plan can deliver, the priority for us for DBC is the provision in Tring of new bigger and better football / sports playing spaces and facilities now.</p> <p>With that in mind, Tornadoes is particularly keen to see how much of the Green Infrastructure can be delivered for Tring ahead of the Local Plan completion, as identified in the DBC Draft Infrastructure Delivery Plan – November 2020 – Settlement Schedule for Tring:</p>
Included files	
Title	Question: Any other comment
ID	EGS7041
Person ID	1265114
Full Name	Kirsten McGregor
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I received formal notice from the council about these development plans 4 days before the deadline to comment? Is that some sort of strategy to stop people from having their say? Well I am 100% against such a massive amount of houses being built especially on greenbelt areas around Northchurch. The number of new houses planned to be built far outweighs the infrastructure being able support the influx of people coming to the area. The doctors surgeries can't cope at present. The roads are already far too congested. Road safety around Northchurch is bad enough is already. Granville Road is</p>

already an accident waiting to happen with cars driving far too fast and using it as a through road. It is already being used as a rat run to avoid the high street with people in a massive hurry to drop their children off at schools, church activities, cutting through to get to Tescos and also using the Social Centre down Bell's Lane. With the lack of parking it's pretty much a one way road anyway so more traffic will be deadly causing lack of safety for those children who walk to school. More housing in the fields by Darr's Lane will cause more noise and pollution, loss of habitat for the wildlife (bats and owls to name a few). That area up on Shootersway has had enough new builds, why does there need to be such a ridiculous increase in that area? The proposed numbers don't add up? Anyway the main problem is that 4 days is not enough notice to give residents to comment! Where's the democracy in that kind of sneakiness?

Included files**Title** Question: Any other comment**ID** EGS7072**Person ID** 1265105**Full Name** Jonathan Tay**Organisation Details****Agent ID****Agent Full Name****Agent Organisation****Yes / No** Yes*** Yes***** No****QUESTION ANY OTHER COMMENT comment** Please reconsider building so many new homes in the Borough, especially given the very limited improvements to transport infrastructure. The Plan has many good ideas, but the vast increase in population in the Borough this Plan will bring will only serve to worsen the lives of existing residents.**Included files****Title** Question: Any other comment**ID** EGS7153**Person ID** 1265153**Full Name** A Barratt**Organisation Details****Agent ID**

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I'm struggling to navigate the response document and have had numerous errors appear. However, I hope these comments reach the right destination.</p> <p>My principal concern regarding this process is that while the documents state that consultation has been underway for a while, I only became aware of the proposals for Tring today when driving past Tesco when I saw a banner outside of the farm.</p> <p>Asking for consultations in the middle of lockdown cannot be right, either morally or I suspect legally. You have a duty to seek the views of the residents of dacorum and this patently has not been done.</p> <p>Outside of covid, one would imagine that town meetings, marches, demonstrations would have been likely which would have raised awareness. Instead, this consultation has taken place in 10 weeks while the government has told people to stay home to save lives.</p> <p>This action should be paused until lockdown ends.</p>
Included files	
Title	Question: Any other comment
ID	EGS7157
Person ID	1265074
Full Name	Stephen Wilson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	No
QUESTION ANY OTHER COMMENT comment	

Included files	
Title	Question: Any other comment
ID	EGS7173
Person ID	1265133
Full Name	Sarah Storey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Dacorum BC should not take its constituents for granted by attempting to foist unjustifiable and disproportionate development proposals on them. Upcoming local elections will undoubtedly reflect the unhappiness of a large proportion of the local population with this sorry excuse for a local plan.
Included files	
Title	Question: Any other comment
ID	EGS7184
Person ID	1265163
Full Name	Michael Curry
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	1. I support the views expressed by Tring Town Council in their response to this consultation.

2. Site 115L “New Settlement near Long Marston” one of the additional sites put to the Council since the conclusion of the Site Assessment Study should be excluded from any further consideration for inclusion in the Local Plan for the reasons given in the attached evidence.

Included files	MCurry DBC Local Plan Other Comment.pdf
Title	Question: Any other comment
ID	EGS7186
Person ID	1262099
Full Name	Chris Taylor
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>In conclusion the Local Plan:</p> <ul style="list-style-type: none"> • Is unknown to many residents due to lockdown restrictions • Is deeply unpopular with those residents who are aware of it • Uses out-of-date, 2014 housing projections which are much higher than current projections • Prioritises housing targets above the Green Belt, climate change, sustainability, biodiversity and public health • Does not meet the need for social housing • The population increase in Northchurch (over 50%) will cause overcrowding and congestion • Will destroy 40 acres of Green Belt in Northchurch, and 21,000 acres across Dacorum • Is not compatible with the Sustainability Appraisal • Will damage the River Bulbourne • Will harm the physical health and mental wellbeing of local people • Fails to protect the distinct community, history and rural character of Berkhamsted and it's surroundings • Fails to maximise the use of brownfield land for housing • Fails to provide the infrastructure needed to cope with increased demand • Fails to provide each development with a traffic management plan
Included files	
Title	Question: Any other comment

ID	EGS7205
Person ID	1265127
Full Name	Jason Foxwell-Moss
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The data for the plan is old, the evidence for such large numbers of new dwellings unconvincing, the impact on Berkhamsted enormous and long-lasting – we need to stop, review, and reassess what may be needed in a post-COVID world rather, than slavishly continuing on a path set by ideas formed before the world changed, and what we need with it.
Included files	
Title	Question: Any other comment
ID	EGS7280
Person ID	1265039
Full Name	Michael Lelieveld
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I have made comments at questions 3, 4, 5, 7 and 24 but overall I feel strongly that the increase in dwellings intended for Dacorum and Berkhamsted are excessive and damaging. Berkhamsted is already bursting at the seams within its border of the A41 on one side and AONB on the other. Its topography, valley location and existing layout do not allow for widening of roads or addition of cycle lanes. Nor can the infrastructure be easily expanded. Being a valley, pollution

naturally settles in the Town and is already excessive on low wind days. The housing numbers proposed are above the ONS calculations and should be revisited. The intention to re-designate Green Belt to provide sites for over 2,000 homes in Berkhamsted is unacceptable - especially when Berkhamsted is within the Chilterns AONB. The proposals would ruin the charm and unique character of our historic Market Town forever, and make it no different to any other densely populated over urbanised town or city in the South East.

Included files

Title Question: Any other comment

ID EGS7281

Person ID 1261685

Full Name Ian Edwards

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I believe that the plan fails on several counts:
 1. Disproportionate increase of housing in Tring - a town with little ability to 'flex' for such an increase;
 2. Unnecessary use of green belt land;
 3. Lack of consideration to post-pandemic societal changes

Included files

Title Question: Any other comment

ID EGS7297

Person ID 1265179

Full Name JANE DAWSON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS7298
Person ID	1265179
Full Name	JANE DAWSON
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS7318
Person ID	1265182
Full Name	JAMES NODDER
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>feel this process needs to be delayed until the Covid crisis is over so fuller consideration can be given to public opinion.</p> <p>Not enough consideration is given to infrastructure needs.</p> <p>Especially with regard to Medical Primary Care provision. The towns GP care is in crisis and has only been rescued by the amalgamation of three practices. However the service is still near breaking point. The increase in population proposed will cause severe difficulties. Without a considerable increase in staffing there will be unrelenting pressure that will inevitably lead to a reduction in the standards of care we expect.</p>
Included files	
Title	Question: Any other comment
ID	EGS7335
Person ID	864107
Full Name	Mr Antony Hetherington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an

updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.

Included files

Title Question: Any other comment

ID EGS7346

Person ID 1207259

Full Name Mr Graham Bright

Organisation Details Chairman
Grove Fields Resident Association

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS7358
Person ID	1265131
Full Name	Malcolm Appleford
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I was appalled to learn that there is a major planning 'consultation' which concludes at midnight tonight.</p> <p>This evening I was alerted to this whole sorry business by a friend who had just found out themselves. I had no official notice from the council about it. I have just had time to quickly scan the massive electronic document and make a few responses. I could not even continue until midnight because at about 23:15 I received a system message saying I would be timed out in 9m 40s.</p>
Included files	
Title	Question: Any other comment
ID	EGS7385
Person ID	1265371
Full Name	David and Charlotte Vesey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>We are sorry to be so negative and would like to thank your team for the huge effort in producing the draft plan. We do recognise that it is driven by government requirements. We note that the last coalition government was considering new towns as a good solution, where full infrastructure can be planned and put in place before rather than after required. The economic impact of Covid has also led us to see the need for far more council housing.</p>
Included files	
Title	Question: Any other comment
ID	EGS7396
Person ID	1265375
Full Name	LANYING BURLEY

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I appreciate that things should continue in lockdown but for something as important and as significant as this should be done when people have the freedom to engage and discuss this issue which will adversely affect so many people. A proposal to increase housing in the borough by 25% on 2000 acres of Green Belt, countryside and urban green space is a major plan which needs to be fully considered by everyone involved. I hope that this is not being pushed through at a time when people cannot easily take a stand or get together to voice their opinions.
Included files	
Title	Question: Any other comment
ID	EGS7413
Person ID	1265377
Full Name	PHILIP MOORES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available particularly in light of the impact of COVID-19; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty, and Sites of Special Scientific Interest. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS7414

Person ID 1265377

Full Name PHILIP MOORES

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available particularly in light of the impact of COVID-19; including more detailed assessment of housing supply requirements; the opportunities available for delivery within

established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy.

Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

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Included files	
Title	Question: Any other comment
ID	EGS7426
Person ID	1265380
Full Name	JON WRIGHT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

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The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.

Included files

Title Question: Any other comment

ID EGS7427

Person ID 1265380

Full Name JON WRIGHT

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p> <p>The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.</p>
Included files	
Title	Question: Any other comment
ID	EGS7438
Person ID	1265381

Full Name	DR SUE DAVEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p> <p>The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.</p>

Included files	
Title	Question: Any other comment
ID	EGS7439
Person ID	1265381
Full Name	DR SUE DAVEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein</p>

for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.

Included files

Title Question: Any other comment

ID EGS7451

Person ID 1145699

Full Name Mr Paul Walker

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment **Severe lack of consultation with the local community**

There has been a severe lack of consultation of the development plans with the local community, plus due to National lockdowns, there has been very limited opportunity for objection, particularly for the vulnerable.

Included files

Title Question: Any other comment

ID EGS7477

Person ID 1263129

Full Name Elizabeth Norton

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	We would also add that we found the online consultation portal incredibly frustrating - it seems to be designed to make commenting difficult.
Included files	
Title	Question: Any other comment
ID	EGS7480
Person ID	226124
Full Name	Mr Nicholas Heath
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I am a resident of Berkhamsted, having moved into the area in 1995 with my family. I have studied the proposals around the draft Local Plan and have the following comments: Firstly, and given the importance of the proposals to the future of the whole Borough, I am concerned that the Consultation has been held over the Christmas period and during the pandemic. There are a lot of neighbours and friends within the Borough who seem unaware of the details of the proposals, and even of the Consultation itself. We have had no door-to-door communication from DBC, and with the closure of libraries etc it appears that many, specially elderly, people are completely unaware of the proposals. The timing of the Consultation, being held during the pandemic lockdown and over the Christmas/New Year holiday, as well as during the cold winter period, seems unfortunate.
Included files	
Title	Question: Any other comment
ID	EGS7488
Person ID	1265557

Full Name	BRIAN DIXON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Reference to our chat of todays date on the problems encountered in perusing the “Plan” & attempting to make comments on the computerised comment document.</p> <p>Would you please express my complete exasperation, to the local council, with attempting to understand the content of the “Plan”, ALL 844 pages of it, with its “repetitive & verbose verbiage” & a computerised comment document that would task most IT students to complete, let alone the average resident who spends a very limited time gazing at a computer screen. I have spent hours, over the past couple of weeks, going through the ”Plan” & making comments BUT had to give up completely with trying to make sense of the computer comment document.</p> <p>The “Town & Country Planning Regs.” specify that the preferred method of gleaning information from the Plans should be via a website, BUT Paragraph 035 of the ACT ALSO specifies “Authorities are expected to be mindful of the need to produce concise, visual evidence, written in plain English to help ensure that it is easily accessible to local communities, to avoid them becoming disengaged with the process.”</p> <p>I believe that unless comments are passed on to some higher, more responsive authority than the council, about the apparent tactics to Bamboozle the Dacorum Residents in to passing these far reaching plans, we will still be, being presented with the same situation up to the FINAL document being presented for Government approval.</p>
Included files	
Title	Question: Any other comment
ID	EGS7501
Person ID	1265562
Full Name	ALICE WILNE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am writing to object to the proposed local plan.</p> <p>I find it shocking and disturbing that the Council is looking to change so dramatically the size and therefore nature of our local towns.</p> <p>Having grown up in the area and gone to school in Tring, I now live in Berkhamsted with my family. I value the character of these market towns and the amazing natural beauty of the surrounding countryside.</p> <p>I find it very difficult to reconcile how there can possibly be a demand for the level of housing proposed. The statistics on which these numbers are based appear to be already many years out of date and on any basis clearly do not take account of the changes which the pandemic will undoubtedly have on housing needs. The local towns are currently very much in the commuter-belt for London with the inevitable knock-on effect on house prices. With more people working more often from home in future, it is widely considered that people will also look to locate much further out from London. It seems premature to put in place a Local Plan for such a drastic increase in house building before the true impact of the pandemic on working lifestyles and housing needs is known. Given the pace of change in businesses already in the last year, a delay of only a few years may be all that is necessary to get a better handle on what the local area's housing need actually is going to be over the next 10-20 years.</p> <p>I am also particularly concerned about the impact on the local environment. I am shocked to learn that it is even possible to build on green belt land and dismayed at how much of it is proposed to be sacrificed for "growth". The impact that such an increase in the local population will have on the surrounding countryside will surely be immense and in particular will increase the need for water extraction from the aquifer which will threaten the upper reaches of the rivers Gade and Bulbourne, and is likely to leave these dried out to nothing.</p> <p>Finally I consider the way this consultation has been conducted is simply inadequate. We received for the first time today - 25 February - a leaflet through the post with some details of the Local Plan from the Council. This is for a consultation which apparently opened on 27 November 2020 and is to close in two days' time. Fortunately I had recently been alerted by a friend to do my own reading on the plan but I am concerned that many in the local community may not have been aware of the plans until this late stage or even now.</p>

I am also submitting this objection by email as the online portal for doing so is so unwieldy. How anyone who is not online or computer literate is supposed to respond to the consultation I don't know. Limiting the ability to respond to this format must surely be excluding a sizeable proportion of the local population.

I hope that the Council will reflect and accept that this plan needs to be delayed until there is greater clarity on the likely impact of the pandemic. In the meantime the opportunity could be taken to consider further the environmental impact and in particular the purpose and precious nature of the green belt. Once it has been built on, we won't get it back.

Included files

Title Question: Any other comment

ID EGS7506

Person ID 1265568

Full Name JOHN SHULVER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Also, there are many people who are not sure what is happening due to Covid and not be Internet savvy/connected. It would be farer to have issued printed material to all households, Dacorum is happy to blow its trumpet when it has nice things to announce, but this looks like it is being advertised in a very low key way, in the hope that no one will notice, this is, again, unfair to the current people of Hemel, who will be the ones who suffer from the planning decisions of the council.

Included files

Title Question: Any other comment

ID EGS7513

Person ID 1265572

Full Name DAN STOBBS

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Please take this email as my formal response to Dacorum's Local Plan (2020-2038) Emerging Strategy for Growth.</p> <p>I do not agree that 16,000 houses should be in the plan and believe you should be using up to date figures which would halve that number to around 8,000 houses.</p> <p>The current pandemic has shown how important our local green spaces are and that our green belt land must be protected. I do not believe that inflated housing need is an exceptional circumstance for removing Dacorum's green belt.</p> <p>Green belt land helps protect the shape, size and character of towns and villages preventing them merging into one another.</p> <p>This plan underestimates the potential for brownfield regeneration opportunities which have increased due to the pandemic with more people working from home.</p> <p>The plan does little to address the improvements on infrastructure that will be needed to support 16,000 new houses, especially here in Hemel Hempstead. We currently have a hospital that lacks many key departments such as an A&E or a 24 hour urgent care centre and is constantly seeing departments and services removed and relocated to Watford, not enough GP surgeries for the existing number of residents across Dacorum, we no longer have a walk in police station or adequate police staffing numbers, or sufficient schools or residents' parking. Building more housing is going to make all of these areas much worse, particularly when the proposed infrastructure is severely lacking.</p>

I also understand that we don't have enough water to supply all the extra houses. I believe from what I have read that the extra water needed can only be extracted from the chalk aquifer which in turn will damage the borough's chalk rivers which are classified as priority habitats by the Natural Environment & Rural Communities Act 2006.

I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on a local Facebook group but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS7520

Person ID 1254005

Full Name Matt Leese

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I would like to register my concern at the recently concluded consultation.

The consultation was not publicised. It was incredibly difficult to read the documents with any sense and well nigh on impossible to comment on the plan. I think of myself as IT literate but this stumped me and I was unable to comment.

I strongly believe you should reopen the consultation with proper surveys (either online or on paper) and some easier to read documentation and an easier way of commenting on the plan.

Included files	
Title	Question: Any other comment
ID	EGS7527
Person ID	1265581
Full Name	ASHLEY TICKELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	With a flawed algorithm being used and the consultation being hugely disrupted by the pandemic with explicit instructions to stay at home and essential journeys only, I further fail to see how this is not a flawed and inadequate consultation process.
Included files	
Title	Question: Any other comment
ID	EGS7551
Person ID	1160566
Full Name	Roger Welchman
Organisation Details	Associate AR Planning
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	The opportunity should be taken to review the defined settlement boundary of Potten End. The production of a new Local Plan is the appropriate time to do this and presents the opportunity which should be taken to update and address the existing anomalous boundary which places houses west of The Hamlet (which itself is within the settlement boundary) which from Vicarage Road outside of the settlement boundary. These properties present a continuous built frontage to Vicarage Road and are well located in relation to the main facilities in the village. To address this the boundary should be amended as shown by a dotted black line on the plan extract below. This will align with the settlement boundary to the south which encloses the housing plots at Hedgeside. The proposed amendment to the settlement boundary will provide a more logical, robust and defensible boundary which will endure into the future.
Included files	attachment to EGS7551.png
Title	Question: Any other comment
ID	EGS7566
Person ID	1265606
Full Name	Prof. Jonathan Morris
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Firstly, the consultation process itself has been conducted during the pandemic and with no physical displays or meetings. There are many people in Berkhamsted who will have been unable to respond to the plan as a result. Many residents, particularly the elderly, do not have access to the internet, so will have been unable to either investigate the documentation, nor submit an electronic response. Furthermore, during the course of the pandemic many residents will have been minimising any journeys made into public centres etc, including a large number of shielders. In short, this consultation fails the tests of the application of the Equalities Act of 2010 as it does not allow all citizens equal opportunity to comment upon it and have those comments taken into consideration: it is directly discriminatory against those residents who, primarily as a result of the protected characteristics of age and disability, will have been prevented from taking part. It is notable in this regard that similar consultations in other areas have been postponed until post-pandemic, raising the suspicion that the Borough does not intend to promote an equal and open consultation, and has deliberately taken steps to avoid doing so.
Included files	

Title	Question: Any other comment
ID	EGS7568
Person ID	1265607
Full Name	Victoria Hayes
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Apologies that this is on email rather than using the form but I have struggled to get it to work. I would like to be notified of future local planning etc.
Included files	

Title	Question: Any other comment
ID	EGS7585
Person ID	1265614
Full Name	JACKIE BARKER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an

updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.

Included files	
Title	Question: Any other comment
ID	EGS7586
Person ID	1265614
Full Name	JACKIE BARKER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p> <p>The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.</p>
Included files	
Title	Question: Any other comment
ID	EGS7596
Person ID	1265618
Full Name	RACHEL WOODS
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Finally I object to the way this consultation has been conducted during a national lockdown when it has not been possible for people to attend meetings face to face. The way it has been carried out has also disadvantaged the involvement of the large number of people who do not have access to email or online information.
Included files	
Title	Question: Any other comment
ID	EGS7615
Person ID	1143218
Full Name	Mr Terry Cartmell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield</p>

land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files**Title** Question: Any other comment**ID** EGS7626**Person ID** 1207710**Full Name** Penny Bennetts**Organisation Details****Agent ID****Agent Full Name****Agent Organisation****Yes / No** Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment The urgency of climate change should be central to the Local Plan and I do not think it is nearly central enough**Included files****Title** Question: Any other comment**ID** EGS7628**Person ID** 1265744**Full Name** JOANNE MENNIE

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>>> I am writing in relation to the massive development of Dacorum housing currently in consultation, which I - and most people I have recently spoken to - have only just heard about, and which is only in consultation until this coming Sunday. I was unaware of the booklet that was supposed to come through residents doors.</p> <p>>> A booklet through some doors and info on the website is not sufficient to inform all residents of Dacorum, especially during these times and urgently needs reconsideration.</p>
Included files	
Title	Question: Any other comment
ID	EGS7635
Person ID	1265747
Full Name	STEPHANIE BRADLEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I would like to make the following points:</p> <p>To hold such a detailed plan consultation in the midst of a worldwide pandemic is questionable. People are far more focused on other issues crucial to their survival and have been over the past year. This is borne out by the tiny number of responses you have received.</p>

The plan was presented in a way that was not user friendly, salient points were not easily picked out, even by those who are highly educated, let alone those are not. This type of plan should be presented in a clear and concise but fully explicit manner such as an exhibition, with displays that are accessible to all (clearly not possible in a pandemic), for all areas of Dacorum.

The response portal is not at all user friendly and has put many people off responding.

The plan and consultation was not widely advertised and only after much petitioning about this point was literature sent to every household. The literature sent was wholly inadequate and set to mislead about some of the most important (and controversial) posts in the plan.

The pandemic has resulted in massive changes in lifestyle and these are not reflected in the plan, therefore it should be revised in light of these major changes to how we live and work.

It makes no sense to use the 2014 ONS figures with the incorrect algorithm when more realistic projected numbers can be based on the more recent 2018 projections. Using the 2014 figures does not provide an “objectively assessed need”. Consequently the numbers projected are far too high.

Villages will cease to be self-sustaining and become car-linked hubs to the main towns.

Social housing needs for the area will not be met by this plan.

The projected use of greenbelt land should not be pursued and the greenbelt should be protected. Alternative locations must be sourced as a priority and the greenbelt protected.

There is no mention of the Glover report which proposes that the AoNB becomes a National Park. This plan goes against this report.

Climate Change considerations are key. The plan does not address how house building and subsequent use, transport and infrastructure will align with the Government 2025 net zero target. The carbon cost of using greenbelt land is key.

Many of the documents referenced are in draft form and not up to date., including the habitats assessment (2006). There are no Habitats Regulations Assessment Documents .

Biodiversity value change assessments should be included and verified independently.

Most of the developments will be taken by commuters rather than locals as not affordable for locals. Priority and affordability for locals should be key.

Inadequate transport and infrastructure: Provision must be made for sustainable transport from existing and new developments. Most of the new developments are out of town and the car cannot be prioritised for travel to stations (most of these developments will be for commuters and few locals). Bicycle travel must be prioritised. I am too scared to cycle on the roads. My husband has had 3 serious accidents (broken collarbones twice) due to potholes.

The people of Dacorum must have this plan explained to them so that they can understand the full impact of the plan proposals and hopefully realise that it is highly detrimental to future generations and can challenge it accordingly. Having spoken to them, almost all of my friends have no real idea about any of it and the seriousness of it.

The points above should be addressed and the plan put out for consultation in a correct manner once the world returns to some sense of normal... our future depends on it.

Included files

Title Question: Any other comment

ID EGS7644

Person ID 1265748

Full Name Mr Roger McVey

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS7659
Person ID	1265752
Full Name	Mrs Flora Moores
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

<p>QUESTION ANY OTHER COMMENT comment</p>	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p> <p>The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.</p>
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Included files	
Title	Question: Any other comment
ID	EGS7661
Person ID	1265753
Full Name	JANE CRESSWELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
QUESTION ANY OTHER COMMENT comment	<p>I object to the way this consultation has been conducted during a national lockdown.</p> <ul style="list-style-type: none"> - Many people still do not know about it. - People without access to IT are excluded. - People have not been told they can send a handwritten response by post. - There has been inadequate publicity. <p>A copy of the local plan was supposed to be delivered to every home in the Borough. No-one on my road received a copy. I had to email to request copies and they were all received with less than one week of the consultation period remaining.</p> <p>Elderly neighbours do not have access to the internet and it is very disingenuous to suggest that the plan could be viewed in the library which is not open for browsing or the civic centre when we are in the midst of a very serious health crisis.</p>
Included files	
Title	Question: Any other comment
ID	EGS7665
Person ID	1250022
Full Name	Mr Michael Ridley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>3 The NLP does not have the support of the Elected Representatives.</p> <p>The DBC councillors are unanimously opposed to the criteria on which the housing needs are based, and Cllr Andrew Williams wrote to Robert Jenrick (Communities Secretary) to raise their concerns. Subsequently the Government's algorithm has been withdrawn. DBC should not be pursuing a policy which is opposed by its elected representatives, and for which the Government policy used to justify it has been withdrawn.</p>
Included files	

Title	Question: Any other comment
ID	EGS7678
Person ID	1261784
Full Name	Nigel Vanner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment

ID	EGS7693
Person ID	1265757
Full Name	JENNIFER GAIL FREER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Q9 Additional</p> <ul style="list-style-type: none"> • I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown • I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard • Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded. • Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown • The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation • There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing • The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT • It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown • People expect consultations to involve public meetings where officers can explain what is proposed and answer questions • Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

Included files	
Title	Question: Any other comment
ID	EGS7703
Person ID	1265614
Full Name	JACKIE BARKER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>

The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.

Included files

Title Question: Any other comment

ID EGS7707

Person ID 1265762

Full Name Margaret Puckey

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS7718

Person ID 1265765

Full Name Miss Inma Rodriguez

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p> <p>The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.</p>
Included files	
Title	Question: Any other comment
ID	EGS7730
Person ID	1265776
Full Name	Anne Oldfield
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	In addition I have concerns that the timing of this consultation during the COVID pandemic and the winter months means that there are people, some of which are elderly, disabled or on lockdown, that are not aware of it and/or unable to respond. The timing is also unsuitable for properly accessing the conservational impact on the intended housing sites and their surrounding areas. The impact Greenbelt has on our wellbeing and on climate change has not been sufficiently considered. The criteria that for lawfully building on Greenbelt sites needs to show that this is necessary has not been met.
Included files	
Title	Question: Any other comment
ID	EGS7745
Person ID	1265778
Full Name	Councillor Lara Pringle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard</p> <p>— Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown.</p>

- The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation.
- There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing.
- The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT.
- It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown.
- People expect consultations to involve public meetings where officers can explain what is proposed and answer questions.
- Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

I am concerned that developers who are using this local plan consultation for marketing purposes seem to have been able to contact more local people in Northchurch than Dacorum Borough Council has been able to contact. This has caused genuine confusion and distraction from the real proposals under consultation. The 'beggar-my-neighbour marketing techniques, setting one side of Berkhamsted against the other, with promises based on 'visions' of what might be possible, have influenced the responses of residents. This is apparent from the conversations I have had with the small proportion of residents I have managed to reach in zoom meetings and on the phone. In normal consultation processes, meetings in village halls would be the norm with officers on hand to answer questions. In such circumstances, the influence of aggressive marketing campaigns could be reasonably counteracted by representations from officers or elected representatives. The combination of a lack of publicity; lack of opportunity for public presentations and Q&A sessions; lack of ability for representatives to talk to residents on their doorsteps or in their homes balanced against an aggressive well funded marketing campaign has the potential to distort the public responses. It is fair that these concerns should be recorded and factored into any analysis of the responses from the public.

During the time of the consultation, because of the threat to the identity of Northchurch, which is perceived locally as an existential threat, as the local DBC councillor, I have been working full time for four days per week on publicising this consultation. I certainly have not been able to reach all of my residents. However it is clear that those residents who are aware of this consultation have been alerted of the need to respond and the impact on Northchurch by me. The pamphlet that has been distributed has not reached most people and is insufficiently detailed for the casual reader to note the number of homes planned for Northchurch. For some reason, despite having its own parish council, Northchurch is not referred to by name in the proposals. The brochure, even where it does reach my residents, simply fails to alert them to the significance of the developments, given that all of them are referred to by Berkhamsted notation.

There are clearly residents all over the Borough who have not realised that this consultation is taking place - I doubt many other councillors have put in the effort I have done to alert residents to this.

There is a considerable sense of grievance in the Northchurch community that such extensive development proposed for Northchurch was not brought to the attention of many at all, and when the brochures were received, the detail was such that only the most diligent would spot the extent of development proposed for our parish. This indicates an urgent need for council officers to familiarise themselves with the history, setting and topography of Northchurch before these proposals move forward.

Of the extensive number of Northchurch residents I have consulted, they are unanimous in the view that this consultation should not have taken place during a national Lockdown. They are also baffled as to why a consultation process should be run, when those who are proposing it declare in full council that the plan is not one they believe in or want to execute. This leads residents to be concerned about what the plan that may eventually be implemented will look like, if not the one currently proposed. It is necessary in such circumstances for any reviewed plan to be put out for full public consultation at a future date, when traditional consultation methods in keeping with reasonable expectations of residents can take place. To do otherwise would be irrational as residents have been told that the proposed plan is not the plan that the council hopes to eventually ratify.

Included files**Title** Question: Any other comment**ID** EGS7786**Person ID** 1265901**Full Name** Noelle Hudson**Organisation Details****Agent ID****Agent Full Name****Agent Organisation****Yes / No** Yes
* Yes
* No**QUESTION ANY OTHER COMMENT comment** I tried to submit my response via the portal on the website but was unsuccessful (like many others I have spoken to). I also don't believe the consultation and the consultation period has been fair as I have not received, along with numerous other residents, relevant information packs. I came across information about this consultation only through Facebook (that another villager put up) and I strongly feel something of this importance should have been more widely distributed. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.**Included files**

Title	Question: Any other comment
ID	EGS7791
Person ID	1265904
Full Name	Mrs Alex Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am gravely concerned by this - as well as the way this consultation has been organised and arranged. This has all been pushed forward during the middle of a pandemic. Are you trying to get it through by hoping no-one is aware it is happening? While people are distracted? While people are struggling with keeping afloat, coping with loved ones dying, having their own battles against long Covid? When they are too preoccupied to have the ability to object properly? The information has not been available in acceptable ways - viewing plans in public spaces has not been possible for totally obvious reasons. You 'kindly' extended the period to submit comments by a massive one month - totally inadequate.</p> <p>So how have we been supposed to view the plans? Online. Again - totally inadequate. A woefully poor 'virtual physical space' to view the plans - this is not acceptable. Firstly - you are assuming everyone in the borough has the ability to view these online. Secondly - you are assuming everyone the plans concern is computer literate, has adequate wifi, etc. The 'virtual physical space' was confusing, hard to follow and again - totally inadequate. Is this really the best you could do to communicate your plans to residents? I am incredibly disappointed in your entire handling of the process from start to finish.</p> <p>You need to withdraw these plans and go back to the drawing board and start again. IMMEDIATELY.</p> <p>I trust my objections will be thoroughly noted - and considered both properly and thoroughly - along with all the other objections.</p>
Included files	
Title	Question: Any other comment
ID	EGS7826
Person ID	1265913

Full Name	Mark Cooper
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS7840
Person ID	1265915
Full Name	Mr Stephen Trueman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an

updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS7847

Person ID 1265143

Full Name Abigail Evans

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION ANY OTHER COMMENT comment

Life has changed since Covid19 and Brexit and I think that any building plans should take this into account.as people are commuting less and working from home more. I know from both my employer and those of my friends that working from home will be far more common even after lockdown so we should not be thinking of Hemel as a commuter town in the way that it has been in the past. The UK population may have fallen by as much as 1.3 million people as a result of Covid, and this includes a decrease in London of almost 700,000 (from a report by the Economic Statistics Centre of

Excellence, published in January 2021). The pressure on housing in London has long been a driver of increased housing demand in Dacorum, so it stands to reason that a big fall in the population in London will reduce demand in Dacorum, and this is likely to be exacerbated by lower EU immigration following Brexit. Given we have seen such large change over the last two years, it seems foolhardy to use out-of-date models to plan future housing need. Please push for the government to use the most recent ONS data for the calculations.
Please listen to those of us that love our town and our green space and do all you can to fight the government targets. They are not fair and Hemel seems to be taking far more of a hit than other places.

Included files

Title Question: Any other comment

ID EGS7849

Person ID 1145752

Full Name Mrs Lucy Cross

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION ANY OTHER COMMENT comment The plan also fails to take into account the impacts of the coronavirus pandemic and recently expanded permitted development rights, both of which are likely to result in much greater conversion of commercial space (especially office and retail) to residential use. The council should be focussing on brownfield regeneration opportunities to meet housing needs without destroying valuable green belt land.

Included files

Title Question: Any other comment

ID EGS7883

Person ID 1265985

Full Name PAUL ELLERAY

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	In response to the draft local plan entitled 'Dacorum Local Plan 2020-2038 Emergency Strategy for Growth Consultation' . I am appalled that this plan is trying to be pushed through at a time when we are suffering under COVID and little attempt is being made to publicise this. A stark example of trying to hide this from general local public awareness.
Included files	
Title	Question: Any other comment
ID	EGS7910
Person ID	1265991
Full Name	NICHOLAS MORGAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Q9 Additional</p> <p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard — Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown — The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation — There was conflicting advice from the leadership of Dacorum Borough</p>

Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing — The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT — It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown — People expect consultations to involve public meetings where officers can explain what is proposed and answer questions — Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

Included files**Title** Question: Any other comment**ID** EGS7911**Person ID** 1265992**Full Name** KATY PHILLIPS**Organisation Details****Agent ID****Agent Full Name****Agent Organisation****Yes / No** Yes*** Yes***** No**

QUESTION ANY OTHER COMMENT comment I'm sending this email, in regards to the development of Dacorum housing currently in consultation. I have only just been made aware of this - most people I've spoken to also weren't aware, I was shocked to find out the consultation ends today. I never received the booklet that was supposedly delivered to residents

Information on the website and booklets dropped through a few of the residents doors, is not sufficient to inform all residents of Dacorum, especially during these times and urgently needs reconsideration.

Included files**Title** Question: Any other comment**ID** EGS7917**Person ID** 1265995**Full Name** REBECCA HARTE

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Firstly, this process has been pushed through at a time when people are unable to fully engage. Whilst asking for opinions, the current situation prevents a certain demographic within our community from being able to engage safely and free from worry. A significant proportion of our community in Northchurch - note Northchurch and not West Berkhamsted - do not have computers and email addresses. Therefore delaying this consultation until such time as the restrictions are fully lifted is the only just course of action.</p>
Included files	
Title	Question: Any other comment
ID	EGS7944
Person ID	1265997
Full Name	ROSE SHERIDAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I received no communication from DBC indicating the proposed plans, despite being a resident of Northchurch. I believe it is unacceptable to propose such dramatic change to our towns without full consultation AND inclusion of the population in the design and development of our towns for the community and for the future.</p> <p>This feels very much like a land grab to profit the few.</p> <ul style="list-style-type: none"> — I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown — I am concerned that many residents simply did not know this was going on — publicity was

poorly planned and haphazard

- Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.
- Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst homeschooling children as well as dealing with the challenges of CV19 and lockdown
- The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation
- There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing
- The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT
- It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown
- People expect consultations to involve public meetings where officers can explain what is proposed and answer questions
- Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

Included files	
Title	Question: Any other comment
ID	EGS7946
Person ID	1265998
Full Name	BRYONY CLARK
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> The consultation process for such a major development is completely flawed and being rushed through by stealth tactics. Residents with no access to libraries or the skills required to navigate the online documents have effectively been ignored. If it weren't for me, my 90 year-old mother would have absolutely no idea about this plan - (she has no access to local news in any format). I believe that when we come out of COVID lockdown there will be hundreds of similar people who will get to know too late to object.
Included files	
Title	Question: Any other comment
ID	EGS7951
Person ID	1266000
Full Name	JANE OSTLER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS7960
Person ID	1266002
Full Name	ROXANNE RANSLEY
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	This plan uses numbers of houses based on out of date information, the growth in population that is planned for Dacorum is unrealistic. As a Borough we have no hospital, rail interchange and limited general employment for a larger population. The plans would encourage people with higher incomes to move here rather than provide homes for existing residents.
Included files	
Title	Question: Any other comment
ID	EGS7964
Person ID	1266005
Full Name	ELEANOR SUTTON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I would also like to highlight that our household has received no formal correspondence from the council on the consultation and have been reliant on social media to alert us to the need to respond and the upcoming deadline. Many of our neighbours are elderly and less likely to be using social media and therefore I am concerned that they will not have had access to the same level of information that we have had. Due to the current lockdown limiting people's movements and ability to interact across households, I think there is a real danger that a number of people's views will not be heard on this important issue.</p> <p>In addition, the portal has proved difficult to navigate and to submit our response, hence doing it in this way. My husband (who has submitted his response separately) works in IT and therefore if we found the website challenging, I suspect we are not alone. Again, I am concerned that others may have been unable to make their response known and may have simply abandoned the process, finding the website obstructive.</p>

Included files	
Title	Question: Any other comment
ID	EGS7976
Person ID	1266006
Full Name	SUE ELLERAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am appalled that this plan is trying to be pushed through at a time when we are suffering under COVID and little attempt is being made to publicise this. A stark example of trying to hide this from general local public awareness.</p> <p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown — I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard — Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home schooling children as well a dealing with the challenges of CV19 and lockdown — The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation — There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing — The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT — It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown — People expect consultations to involve public meetings where officers can explain what is proposed and answer questions — Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law ‘</p>
Included files	

Title	Question: Any other comment
ID	EGS7988
Person ID	1266012
Full Name	SIMON EDWARDS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I object to the way this consultation has been conducted during a national lockdown. - Many people still do not know about it. - People without access to IT are excluded. - People have not been told they can send a handwritten response by post. - There has been inadequate publicity
Included files	
Title	Question: Any other comment
ID	EGS8002
Person ID	1266015
Full Name	SOPHIE WHITTON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	a) I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown — I am concerned that many residents simply did not know this was going on

(neither of my elderly neighbours were aware until I told them 2 weeks before the consultation end date). Publicity was poorly planned and haphazard — Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT not only felt excluded but realistically were excluded. Sending posted leaflets with cartoon representations of these developments in the days before closing the consultation is risible.

b) Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst homeschooling children as well as dealing with the challenges of CV19 and lockdown. The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation.

c) There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing. The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT. It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown

d) People expect consultations to involve public meetings where officers can explain what is proposed and answer questions — Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

Included files

Title Question: Any other comment

ID EGS8004

Person ID 1266017

Full Name LOUISE WALDRAM

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out

to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS8016

Person ID 399431

Full Name Mr David Nield

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I also believe that this consultation is floored as with lockdown the ability to hold public meetings and debate has been lost, as such the process should be delayed until such point that the population can be properly engaged.

Included files

Title Question: Any other comment

ID EGS8027

Person ID 1266031

Full Name EAMONN BRENNAN

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>Inadequate consultation – and large numbers completely uninformed</p> <p>My first point is about the process itself. The decision to run a public consultation during a pandemic and over the holiday period was questionable. As people would be home and in lockdown, neither out and about nor interacting with each other, the customary channels for engaging the public were severely diminished. This would include word of mouth, exhibitions and information events at community centres, the free local papers that people would pick up while out, any local groups leafleting householders to lobby them to respond (as this is not allowed). All of these casual ways of raising awareness would not be available at this time of national lockdown in what was a tier 4 area for much of the relevant period. However, having decided nevertheless to go ahead despite these issues, the council should have recognised the importance of getting the information to each and every household. It is therefore all the more surprising that the council only decided as an afterthought to distribute an information leaflet to every household.</p> <p>Along with most of the people in Potten End village, I did not receive that information leaflet. An online poll of the village suggested 81% didn't receive it. Nor did I receive the October 2020 "Dacorum Digest" magazine that had some information about the local plan within it (although notably this was from before the consultation even started). These gaps were never remedied, as very few people would have known to ask for that which they did not know they ought to have received.</p> <p>I believe this has left many parts of the Dacorum population in ignorance of this process, and that the Council has failed in its duty to ensure robust engagement to such an important plan.</p>
Included files	
Title	Question: Any other comment
ID	EGS8037
Person ID	1266034
Full Name	GRANT TUNMER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

QUESTION ANY OTHER COMMENT comment	<p>I object to the way this consultation has been conducted during a national lockdown.</p> <ul style="list-style-type: none"> - I have not received any communication from the Dacorum Borough Council about the proposals, and many people still do not know about it as there has been completely inadequate publicity about he proposals. - People without access to IT are excluded and they have not been told they can send a handwritten response by post.
Included files	
Title	Question: Any other comment
ID	EGS8054
Person ID	1152837
Full Name	Suzanne Jannese
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>my garden houses the Bulbourne chalk stream running from The Old Mill - The Bulbourne is threatened by low flows and a recent Environment Agency study has concluded that unsustainable levels of abstraction for public water supply are contributing to low flows, and abstraction reductions have been proposed. In the summer of 2019 one leaking canal lock gate, at Lock 48, at Dudswell wasted 2.7 mega litres a day. That is equivalent to the daily use of water by the whole of Berkhamsted. The Bulbourne water quality is deteriorating, despite attempts at improving it. How will any development on this river - just behind and to the left of my house - help the river and all the natural wildlife surrounding it? I strongly object to any building work that mean the loss of Herons, (seen in garden Jan 2021) Egrets, (seen Jan 2021) foxes, (seen Feb 2021) kingfishers, (seen 2020 July) goldfinches, deer, (seen May 2019 and June 2020) crayfish, (seen every month since I have lived here! 2017-2021) minnows, (seen every month when my daughter plays in the stream 2017-2021) hedgehogs, (seen last Sep 2020 before they hibernate) squirrels (see them every day!) and robins (see them every day) - all to be found in my garden, or in the river that flows through it. Hedgehogs are classified by ICUN as vulnerable to extinction - and sightings of them are rare - this little fellow came right up to our sliding doors! They are protected in the UK under the Wildlife and Countryside Act, 1981; Priority Species under the UK Post-2010 Biodiversity Framework and the IUCN Red List for British Mammals. This sighting is now lodged on the Herts Environmental Records Centre database.</p>

Also we had to pay for a bat specialist to come and ascertain if we had bats living in our garage - they are a protected species and as such I wonder how they will survive if there are hundreds of homes being built on the fields/trees where they live?

As a chalk river, the River Bulbourne is of international significance and it falls into the category of a priority habitat under the Natural Environment & Rural Communities Act 2006 (S41). Many species living in it and along the banks rely on a sustained flow of water which is normal in a natural chalk stream fed partly by underground springs like the Bulbourne. A recent case study by 1S. Wilson provides evidence that the Rivers Bulbourne and Gade no longer behave as chalk streams should. He demonstrates that rapid rise and fall in the water levels are more typical of urban run-off than chalk streams and he observed flooding. Surface water running off hard-standing (roads, paths, rooftops, etc) is rapidly directed via drains into these rivers during periods of medium and high rainfall causing the water levels to quickly rise and fall. What should be clear water often becomes cloudy due to silt, rubbish and pollutants. Progressive silting and growth of vegetation in the water channels reduce the flow of water and increase the risk of flooding. - Will buildings and roads increase the probability of damage to the river ecosystem and some homes being flooded? As these rivers are of global significance, should the Local Plan incorporate measures to restore and protect them? Dacorum Borough Council have a duty to have due regard to the conservation of biodiversity under the Natural Environment and Rural Communities Act 2006 (S40). Those habitats and species which are of principal importance for the conservation of biodiversity in England are listed in Section 41 and include the House Sparrow, Cinnabar Moth and Great Crested Newt. s biodiversity likely to be increased, or diminished at the proposed development sites? What specific biodiversity, green infrastructure or compensating measures do you think should be recognised in the various site plans? Are Local Authority measures in place to ensure that developers adhere to a development plan after Planning Permission is granted and before any long-term biodiversity damage occurs?

I am concerned at the loss of hedgerows and trees - all impacted if these wetlands were built upon. We had our planning permission staunchly objected by the conservationists - and we accordingly built a smaller extension and used natural wood as the house's outer covering. How can you justify therefore building hundreds of houses in the same patch of land? Bank Mill Lane has only a handful of cottages - several listed buildings - and already there are traffic issues with cars overflowing from the Old Mill pub. There have been several near collisions on a road that is only wide enough for one car to drive down - and really should be one way. How will this road and indeed the bridge to Bank Mill sustain more cars and people? I can safely predict there would be deaths if this were to be the case.

Investment funds are being allocated to Hemel Hempstead for transport and amenity requirements associated with expansion of the town. Equivalent financial and infrastructure support is not being given to Berkhamsted and Tring.

I think the number of proposed developments across Dacorum is excessive and question the formula used to calculate it....

I am also concerned about families with sick children or elderly and disabled people trying to get to the Gossom's Road surgery where there is already inadequate parking? Trying to see a doctor prior to the pandemic was a near impossibility - how will the town cope with a huge influx of people, when there are already many elderly people living here who will need access to their local GP? Are we to simply never get to see a doctor as there will not be enough GPs to care for that many people...

I am deeply concerned about the strong Countryside / Green Belt boundary Impact on valley sides and important dry valley location. Also I am worried about the encroachment of the urban area along the valley bottom and adjoining open countryside.
 Also the distance to town centre services and facilities, employment, land and station.
 Finally as I have already stated, the impact on setting of the River Bulbourne Reduction in the degree of separation between the town and Bourne End.

Included files

Title Question: Any other comment

ID EGS8055

Person ID 1266040

Full Name DAVID BRADBURY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment I also object to the way in which the consultation has been promoted to the public. It's been inadequate - money has been spent producing a 'virtual exhibition' and an animated film but more attention and budget should have been given to response mechanisms. Apparently brochures have been sent out but we haven't received one and the online portal seems specifically designed to put people off responding. It's been difficult to find out that I can simply email a response as I am doing here.

This entire plan and the process of responding is badly done and completely fails the people of Dacorum.

Included files

Title Question: Any other comment

ID EGS8059

Person ID 1266043

Full Name EMMA WHITAKER

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I would also like to call into question the validity of the consultation on this matter. It feels like you have taken advantage of the pandemic, knowing that a number of factors will minimise the ability of local people to voice their concerns about the consultation. I think this is shameful and makes me even more passionate on this. Elderly neighbours who I have spoken to, feel deeply saddened by the plans, but feel unable to communicate this with you. They do not have email and internet, and lack confidence in writing to you, so they do not have a voice. Having lived here for decades, these residents' concerns should not be brushed under the carpet, but it feels like these are the people you care least about. You could have had meetings with small numbers of people, or walked around the areas where the elderly live, and asked them to fill in a form, but you have done neither of these.</p> <p>I urge to reconsider the housing development proposed in Northchurch for all these reasons discussed.</p>
Included files	
Title	Question: Any other comment
ID	EGS8076
Person ID	1266048
Full Name	RACHEL MORGAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown

- I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard — Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.
- Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown — The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation — There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing — The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT — It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown — People expect consultations to involve public meetings where officers can explain what is proposed and answer questions — Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

Included files

Title Question: Any other comment

ID EGS8089

Person ID 1266052

Full Name GEORGINA THOMSON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment In addition, the refusal to extend the consultation period in this exceptional time when residents' attention is focused elsewhere on dealing with the effects of a global pandemic is shameful and undermines the legitimacy of any plans that are approved.

Included files

Title	Question: Any other comment
ID	EGS8099
Person ID	1266058
Full Name	Charlotte Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	1) I question your timing for this consultation and proposed development. The country is undergoing a dramatic change in response to the effects of the COVID-19 pandemic and Brexit. Social practices and what is demanded in local facilities, our fears and manner of living are all under question. As can be witnessed in our use and need of outside space, the battered state of the high street, will there be travel into London and use of the station or increased engagement with the internet? This extends to the question of what will be necessary in the shape and location of national accommodation which is especially unknown. The changes to living are radical and any new development would need to acknowledge them.
Included files	
Title	Question: Any other comment
ID	EGS8112
Person ID	1266066
Full Name	Shelley Greenaway
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	

QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair, as numerous residents have not received the information packs that some households have received. I do not receive free local papers, and during the lockdown have not been out to see any information that may have been available (ie library). I know this information has been published on Facebook, but strongly feel something of this importance should have been more widely distributed, after all, note everyone has access to the Internet and with home-schooling, lots of tools/time has been taken up. Therefore I believe that consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS8120
Person ID	1266073
Full Name	Hayley Beresford
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> Most of the local residents spoken to had no idea until very recently about the plans. It's not acceptable to sneak the plans in during a pandemic, many people have only recently found out about it and have not had sufficient opportunities to respond. It should be extended again to allow a fair evaluation.
Included files	
Title	Question: Any other comment
ID	EGS8131
Person ID	1145701
Full Name	Mrs Thelma Gillen
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	1 The consultation is taking place during lockdown so that many senior citizens who find using the internet challenging are being denied a voice. Had we not been in lockdown, they would normally be able to see the plans at local exhibitions or view them at the library. It seems morally wrong, in the current situation, not to extend the consultation period.
Included files	
Title	Question: Any other comment
ID	EGS8140
Person ID	1262256
Full Name	Sarah Marshall
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS8143
Person ID	1266087

Full Name	Ross Hughes
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>I am writing to object to the Dacorum Local Plan.</p> <p>My primary objection is that the plan is based on outdated data, using ONS data from 2014 rather than the most recent data from 2018. It is inconceivable to me that the Dacorum Borough Council would knowingly and willingly choose to overlook the latest data to formulate plans that will have such a big impact on the future.</p> <p>I have spent 40 years working as a data analyst in the statistical and market research industries, and we would NEVER use outdated data when newer data were available. It comes across as using data to fit the desired outcome, rather than making informed decisions based on relevant data.</p>
Included files	
Title	Question: Any other comment
ID	EGS8156
Person ID	1266097
Full Name	Gemma Ayres
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>I am also very concerned that more people do not know about these proposals and have not been able to register their objections. Lack of objections cannot be taken as support - I cannot imagine local residents supporting this plan. I feel that many simply have not been well enough informed or given the opportunity to raise their objections.</p>

Included files	
Title	Question: Any other comment
ID	EGS8157
Person ID	1266105
Full Name	Dina Westenholz-Smith
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Inadequate consultation – and large numbers completely uninformed</p> <p>My first point is about the process itself. The decision to run a public consultation during a pandemic and over the holiday period was questionable. As people would be home and in lockdown, neither out and about nor interacting with each other, the customary channels for engaging the public were severely diminished. This would include word of mouth, exhibitions and information events at community centres, the free local papers that people would pick up while out, any local groups flyering householders to lobby them to respond (as this is not allowed). All of these casual ways of raising awareness would not be available at this time of national lockdown in what was a tier 4 area for much of the relevant period. However, having decided nevertheless to go ahead despite these issues, the council should have recognised the importance of getting the information to each and every household. It is therefore all the more surprising that the council only decided as an afterthought to distribute an information leaflet to every household.</p> <p>Along with most of the people in Potten End village, I did not receive that information leaflet. An online poll of the village suggested 81% didn't receive it. Nor did I receive the October 2020 "Dacorum Digest" magazine that had some information about the local plan within it (although notably this was from before the consultation even started). These gaps were never remedied, as very few people would have known to ask for that which they did not know they ought to have received.</p> <p>I believe this has left many parts of the Dacorum population in ignorance of this process, and that the Council has failed in its duty to ensure robust engagement with such an important plan.</p>
Included files	
Title	Question: Any other comment
ID	EGS8162

Person ID	1266109
Full Name	Jeff Trindell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS8164
Person ID	1266111
Full Name	Ulrike Grego
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I wish to register my objection to the draft local plan with the following reasons. 1 Scant awareness of the plan and its impact due to lack of proper consultation and transparency. (I was informed by friends)

- 2 Use of old data (ONS 2014), when new data (ONS 2018) is available and only require about half the amount of houses to be built.
- 3 Lack of infrastructure to sustain such an enormous population increase.
 - water supply and treatment
 - health care
 - education
 - transport
 - employment
- 1 Lack of adherence to Green Belt Rstrictions.

Please consider this for a proper public consultation as Covid restrictions will hopefully soon allow this to happen.

Included files

Title Question: Any other comment

ID EGS8166

Person ID 1162158

Full Name Robert Allnutt

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

This is in response the the Council's request for comments on the strategic plan. My comments are set out below.

I have been resident in Berkhamsted for over 40 years and my children were brought up and educated here. During that time I have lived in a number of different places in the town and have participated in local music and sport and enjoyed the local amenities, shops and facilities. I have tried to support local people elected to represent us because they choose to try to make a difference and to preserve the quality of life we enjoy here. That support can only go so far and the current plan is in my view a fundamental betrayal of the trust local residents have placed in the elected representatives.

Included files

Title Question: Any other comment

ID	EGS8170
Person ID	1264732
Full Name	Paul METCALFE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	We wanted to register that we have not received any brochure from Dacorum regarding this consultation and have only been made aware by residents posters. Also, that although registering on the planning website, we could not find a way to easily make any general comment to the general plan, and are therefore resorting to this email. We trust this will be registered as a bona fide comment on the proposals
Included files	
Title	Question: Any other comment
ID	EGS8172
Person ID	1266115
Full Name	Gillian Metcalfe
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	We wanted to register that we have not received any brochure from Dacorum regarding this consultation and have only been made aware by residents posters. Also, that although registering on the planning website, we could not find a way to easily make any general comment to the general plan, and are therefore resorting to this email. We trust this will be registered as a bona fide comment on the proposals

Included files	
Title	Question: Any other comment
ID	EGS8181
Person ID	1266123
Full Name	Elizabeth Morris
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	There has been no wide-spread public consultation. People do not know about this plan and its impact. It seems the Council has chosen to take advantage of the COVID-19 pandemic to push-through this plan rather than postpone and ensure a wider, fuller consultation with the relevant population. Other councils in England have postponed such consultations until things are more 'settled' around the country; it doesn't seem a big thing to ask Dacorum Council to do the same. And, when re-launching the consultation, it is done so with more publicity, consultation, and transparency. Please postpone the consultation and make it a truly public, transparent one.
Included files	
Title	Question: Any other comment
ID	EGS8194
Person ID	1207825
Full Name	Claire Hobson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	

* No

QUESTION ANY OTHER COMMENT comment

I am responding to the consultation on behalf of myself and the X adults who live with me.

I gave up trying to use the portal as it was impossible to work through all the documentation to answer the questions - why wasn't a simple questionnaire set up, separate from the documentation? This is one of the worst examples of a system set up for the benefit of the people receiving and collating responses rather than making it easy for citizens to reply. This is an unacceptable barrier to responding.

I have lived in Boxmoor for over 23 years, I went to senior school in Warners End and until the pandemic commuted to London daily. I brought up my family here and have loved being close to the town centre, the canal and plenty of green space that sets Hemel aside from many post war developments.

My response lacks detail as there is far too much information to go through on top of an office job, caring for an elderly mother with dementia who has been unable to attend her day centre since April last year, two close relatives suffering from recent and historic trauma, running a small local business that has been busier due to more people working from home during the pandemic, and my role as a local councillor. The consultation is not very accessible or easy to digest on a screen, even for me an IT literate person who has a professional office set up at home, with a large screen/keyboard/mouse etc. For those who only have a tablet or phone it is impossible to engage in any meaningful way with the consultation. I apologise in advance for any typos - I am exhausted from all the extra work I have had to do in the pandemic due to public services being closed for a year and more people in the house and community to look after.

I am educated to MSc level, a formal Senior Civil Servant, and am computer literate - for the avoidance of doubt when reviewing my complaints about how hard you have made it to reply and engage with the process for the citizens of Dacorum.

I urge councillors and officers to take a step back and put themselves in the shoes of residents when designing huge and life-changing consultations. This has not put the council in a good light. Some local councillors have taken to social media to publicise the consultation but there was very little from the council. This consultation should have been postponed or extended to beyond lockdowns and school closures to enable a full and open review and engagement with the whole community.

We support the responses of OneVoice, Chiltern Society and the Liberal Democrat Group, among others, so I will not seek to duplicate their detailed points here, but focus on the main points of concern for a long time resident of Boxmoor, a jewel in Hemel's crown.

Greenfield/greenbelt

The green belt should be protected at all costs, and brownfield sites prioritised over any permanent destruction of greenbelt land. The council has said in public council meetings that they will protect greenbelt to the death but this is not what the consultation says and this is what has enraged so many residents.

Housing requirement and council tactics (Q1)

Too many houses, too few affordable homes.

It is absolutely clear that the number of houses supposedly held to our temples is far far too many on any rationale and evidence-based up to date analysis. The plan is woefully short on ensuring a large proportion of social/affordable housing, which is what residents of Dacorum need. The council has failed its citizens by refusing to face up to the Government and push back on the numbers. To throw the pass to the community in the middle of a pandemic with a consultation that proposes an eye-watering and irrevocable destruction of greenbelt and increase in town sizes of Berkhamsted and Tring is incomprehensible. This is an incredibly risky strategy in the middle of a pandemic when you will not have reached a significant proportion of the community die to pandemic restrictions. There are still more people in Dacorum who don't know about the consultation or its life-changing implications than there are who do know. And of those who do know, how many of them will have the time or energy to reply substantively? Please, on behalf of your residents, fight back at the government figures and listen to us. To ignore any criticism as politically motivated blinds you to listening to what we have to say *as people who live here and will live here, hopefully alongside the next generation, for the rest of our lives - decades* is rude at best and incredibly insulting and not in the interests of what's best for Dacorum at worst. Other councils have fought back, why didn't we? Why didn't you agree the tactics with the residents whose lives will be affected by the new Local Plan?

The evidence base for the number of houses needed in Dacorum should be the 2014 ONS numbers and not 2018.

London Road development

4 storeys max at the station.

Another case of the Council not appearing to listen...in the most recent consultation on the station development, the overwhelming response from residents was to limit any development to 4 storeys to protect the local scenery, including overlooking the ancient grazing land of Boxmoor Trust and the view of Roughdown common and the fields beyond from resident in the heart of Boxmoor village. Why does the current plan say '8 storeys or more'??? What is the point of consultation?

It is clear to anyone who lives in the immediate area or who travels along London Road to and from town and Apsley or the A41 that height is a given at the Plough roundabout and at the scarred land and buildings next to Aldi at the A41 Junction.

There is scope to develop the ugly brownfield sites along London road opposite the moor, eg around the old gas works and near the trainline between the A41 and the roundabout at Roughdown road.

The area between Roughdown Road and the station roundabout must remain low rise to protect the street scene as Hemel moves into more green land towards Box Lane. I will fight any proposal to have higher than 4 storeys along this stretch of road and at the station.

Who are the new homes for?

The original proposals for the station development showed apartments that were clearly for commuters, which would be certain to pull people from London into the areas and with inadequate numbers of affordable properties, would not help local people looking to get onto the property ladder.

Commercial/retail at the station

Lockdown has impacted local businesses heavily and the council should be very cautious about approving retail space at the station that could take business away from Boxmoor village centre or town centre, the latter having taken a huge hit from multiple lockdowns. With the town walkable for the majority of people who would live in starter apartments like those proposed for the station development and regular bus services to town, there is limited rationale to have a supermarket or too many restaurant or food businesses at the station location.

Sustainability/climate change

There is nothing in this plan to reassure me that we would have sufficient water to provide for all of the new homes, nor that the council is acting NOW on the climate emergency they declared. An emergency means taking action immediately and we have seen far too little action and too few ideas in this plan, contradicted by the destruction of the greenbelt etc. The council has also agreed to protect the area's unique chalk streams which are essential to maintaining a balanced ecology. These are at risk now and adding too many more houses will impact them further.

The planned housing should be carbon neutral at worst and negative at best. The plan is woefully unambitious on this.

Infrastructure

The infrastructure plan lacks detail on how the roads and cycle lanes will be built/improved and designed to reduce car use. The council needs to be far more proactive, imaginative and positive about designing for a low carbon future and helping residents live in uncongested places.

In summary

There is insufficient evidence of housing need to support the level of development (Q8). Full exploitation of brownfield sites for the Local Plan is not fully evidenced. So the Plan fails to meet Section 137 of the NPPF, which specifies the exceptional circumstances that need to exist to justify changes to Green Belt boundaries.

PLEASE LISTEN TO US - use the citizen's panel and have one for each area in the plan so we can co-design housing, infrastructure and space together. No one knows the area and its needs better than the people who live here.

There are so many good people who work for the council and have worked so very hard on this plan but this proposal is cloth-eared, unambitious and risks ruining the lives and the enjoyment of Hemel and Dacourm's green spaces forever.

Included files

Title Question: Any other comment

ID EGS8200

Person ID 1266150

Full Name Michela Capozzi

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>1 DBC Vision</p> <p>Dacorum Borough Councillors are voted for by local residents and are trusted to serve in the best interests of those residents. DBC's conduct in writing this Local Plan and then continuing with the consultation period at a time when so many residents will be unable to understand the true impact of this Plan and make their concerns known is despicable. The proposals in the plan, including the development of Green Belt, against previous commitments to protect it, demonstrate a complete lack of respect for the areas they are serving and their local residents. The Plan is based on out of date data with regard to the number of properties needed and shows a complete lack of innovate and sustainable thinking by what are, very obviously, outdated and out-of-touch Councillors.</p> <p>It was interesting to hear, in one of the DBS meetings, Councillors defend their decision to continue with the consultation during the pandemic and ignore the repeated pleas to consider all those residents who would be not have the technical know-how to participate in the consultation because they believed everyone would be able to access the information remotely despite the public witnessing the incompetence of many Councillors attending that meeting to use something as simple as Teams. Having information available in libraries when people are requested to stay at home by the Government and certainly must not travel by public transport as many older residents would have had to do is another example of how wrong DB Councillors have got this.</p>
Included files	
Title	Question: Any other comment
ID	EGS8236
Person ID	1207978
Full Name	Alison Sexton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	

QUESTION ANY OTHER COMMENT comment	I trust you will take my heart felt observations into consideration. People care passionately about their local environment and large-scale developments which threaten the natural world around us are disturbing and upsetting, severely compromising public wellbeing. Please take public feelings seriously and show that you care about the people and places you represent.
Included files	
Title	Question: Any other comment
ID	EGS8242
Person ID	1266156
Full Name	Benjamin Roberts
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I attended the exhibition in Berkhamsted in 2017 and was able to ask questions at the time. However there was no opportunity to formally follow these up or to get answers in writing. More than three years have passed and with the coronavirus lockdown lasting a year, and as a concerned resident of Dacorum, I have noticed enormous activity in house building both at Bearroc Park in Berkhamsted and Roman Park in Tring. I would like to know if these are part of the Local Plan and when was approval for these sites made public? I am not aware of any further information been circulated during the last year and although a short extension has been granted, I would suggest a much longer extension given the aftermath of the coronavirus pandemic. Surely there is time to assess this. Notwithstanding this, please find below my objections
Included files	
Title	Question: Any other comment
ID	EGS8248
Person ID	1266155
Full Name	Annabel Carroll
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard — Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown — The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation — There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing — The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT — It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown — People expect consultations to involve public meetings where officers can explain what is proposed and answer questions — Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".</p>
Included files	
Title	Question: Any other comment
ID	EGS8282
Person ID	1266168
Full Name	Lisa McNamara
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>We are writing to express our objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth. The sheer scale of the proposed development will have a devastating effect on the environment and also the shape and nature of our towns.</p> <p>The areas of concern are:</p> <ul style="list-style-type: none"> • Loss of Green belt land within the Chilterns which is an area of Outstanding Natural Beauty • Impact on environment with loss of green space, loss of trees and damage to wildlife habitats • The sheer scale of the proposed development would result in an over-provision of housing and this would have an impact on the infrastructure and local community of our towns • The lack of brownfield regeneration proposals. • Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny. • The Plan is at odds with the recent government desire to address the imbalance of investment between the north and south of England. Post-Covid in particular it is likely that there will be a reduced requirement to live and work in London and the South East. <p>Berkhamsted, Tring and surrounding towns and villages enjoy green spaces and this is what makes them attractive to the residents. If this green space is turned into residential areas, we will be nothing more than an extension to London with built up and cramped living. This will change the shape and nature of the towns we love. Green Belt was introduced for a reason... to prevent over-building and protect our green spaces... this must remain.</p>
Included files	
Title	Question: Any other comment
ID	EGS8283
Person ID	1266169
Full Name	Sarah Knowles
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>We are writing to express our objection to proposals contained in the Dacorum Borough Council Emerging Strategy for Growth. The sheer scale of the proposed development will have a devastating effect on the environment and also the shape and nature of our towns.</p> <p>The areas of concern are:</p> <ul style="list-style-type: none"> • Loss of Green belt land within the Chilterns which is an area of Outstanding Natural Beauty • Impact on environment with loss of green space, loss of trees and damage to wildlife habitats • The sheer scale of the proposed development would result in an over-provision of housing and this would have an impact on the infrastructure and local community of our towns • The lack of brownfield regeneration proposals. • Over-reliance on growth strategies and partnerships which have not been subject to public consultation and scrutiny. • The Plan is at odds with the recent government desire to address the imbalance of investment between the north and south of England. Post-Covid in particular it is likely that there will be a reduced requirement to live and work in London and the South East. <p>Berkhamsted, Tring and surrounding towns and villages enjoy green spaces and this is what makes them attractive to the residents. If this green space is turned into residential areas, we will be nothing more than an extension to London with built up and cramped living. This will change the shape and nature of the towns we love. Green Belt was introduced for a reason... to prevent over-building and protect our green spaces... this must remain.</p>
Included files	
Title	Question: Any other comment
ID	EGS8289
Person ID	1266170
Full Name	Philip Hill
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	
* Yes	
* No	

QUESTION ANY OTHER COMMENT comment

Please take this email as my formal response to Dacorum's Local Plan (2020-2038) Emerging Strategy for Growth.

I do not agree that 16,000 houses should be in the plan and believe you should be using up to date figures which would halve that number to around 8,000 houses.

The current pandemic has shown how important our local green spaces are and that our green belt land must be protected. I do not believe that inflated housing need is an exceptional circumstance for removing Dacorum's green belt.

Green belt land helps protect the shape, size and character of towns and villages preventing them merging into one another.

This plan underestimates the potential for brownfield regeneration opportunities which have increased due to the pandemic with more people working from home.

The plan does little to address the improvements on infrastructure that will be needed to support 16,000 new houses. We currently have no hospital, functioning police station or sufficient schools & residents parking.

I understand that we don't have enough water to supply all the extra houses. I believe from what I have read that the extra water needed can only be extracted from the chalk aquifer which in turn will damage the borough's chalk rivers which are classified as priority habitats by the Natural Environment & Rural Communities Act 2006.

I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS8299

Person ID 1266172

Full Name Mr and Mrs P.C Pegrum

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

We have lived in Tring for 40 years and have seen a lot of residential building projects taking place during this time and understand that all towns must support growth and development in an appropriate way. We cannot see how increasing a small market town like Tring by 55% (2,731 houses are planned) is a balanced proposal.

We only received the brochure for us to review a couple of weeks ago and this is not sufficient time for anyone to really research and reply to this proposal, but we felt that we must say something. Some of our neighbours did not receive a copy of the brochure and so we are concerned that this omission may have occurred elsewhere denying a full and satisfactory number of comments being received to judge what is right for the residents in the surrounding villages/towns.

Also because of the Covid-19 situation, we have been unable to attempt to meet with other concerned local people and have a consultation with yourselves face to face as indeed we have done in the past (Tring relocation of local dump site and also when there were concerns about increase in flights from/to Luton London Airport) and to register our concerns/opinions. We have not been able to meet with residents in the High Street and distribute leaflets about the proposal to ensure that most residents are aware of what is happening.

These are just a couple of concerns that my family has.

However of most concern is the planned erosion of the Green Belt in the Borough and AONB. Surely the Council should be seeking other more suitable areas to build upon before developing homes on Green Belt - the definition of which I state from the Government's document Paragraph 133 which says "the Government attaches great importance to Green Belts. 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 their PERMANENCE". Clearly that means that the DBC are working in complete contradiction to the Government's National Planning Policy Framework specifically in the protection and unnecessary development of GREEN BELT land. Surely this is something that the Council Members must need to address before someone decides to pursue this within a legal framework as environmental groups have done with regards to HS2 and how much money would be wasted with court appeals and legal costs yet achieving nothing for everyone concerned.

Surely it would be worthwhile for a postponement of any planning considerations at the moment (Covid-19 lockdown restrictions) until the parties concerned (various local concerned groups, etc.) can meet and liaise with the DBC planning council and hold a meeting that can be positive for all parties involved.

My family have read the recent Response by the Chiltern Countryside Group and fully support the broader points made by them.

Included files

Title Question: Any other comment

ID EGS8303

Person ID 1266173

Full Name Kate Nolan

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>SAVE ONE TREE HILL, NORTHCHURCH</p> <p>One Tree Hill is the name that my family and I have used for the proposed development site in Northchurch (or 'West Berkhamsted' as it is referred to in the planning document) for the 40 years that I have lived here. My children love the fields as much as I do and we enjoy looking out at them and watching how they change throughout the year.</p> <p>I would like to lodge my objection to the proposed plans to build on this land.</p> <p>I believe that these proposed developments in Northchurch, as well as obliterating our precious green spaces, which are so important to all of us for our mental and physical wellbeing, will also put extraordinary pressure on the local environment and residents in terms of traffic congestion and access to local services.</p> <p>Northchurch is loved by all of us who live here for its beautiful views, its calm and quiet pace and its village feel and identity. I believe that these plans will unneccsaairly obliterate this for all of the current residents. The plans have failed to even identify Northchurch as its own village.</p> <p>I have only very recently become aware of these plans and am very surprised that today is the final day to respond, especially given that we are all still in a full national lockdown.</p> <p>I would urge the council to delay these plans to allow for proper consideration and feedback from residents.</p> <p>My personal feelings are that insufficient value has been put on this Green Belt land in terms of its impact on the mental and physical wellbeing of the existing residents of Northchurch. The number of houses proposed is not justified by the latest statistics and the needs of the local community should be put above the desire to make money out of destroying this beautiful and historic land.</p>
Included files	
Title	Question: Any other comment
ID	EGS8320
Person ID	1266175
Full Name	Anna Foster
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I think it is not at all ideal that we only received documentation posted to us about the local plan, this week. We happened to know about the local plan due to being on social media etc, and being part of our community, but if we hadn't, this would not be enough time to gather views and respond. This information should have been sent to residents much much earlier, especially considering lockdown. As it is, we have spent considerable time researching and responding to this plan, time that we don't really have, as we struggle to home school our children, and work ourselves, during this pandemic.
Included files	
Title	Question: Any other comment
ID	EGS8325
Person ID	1207813
Full Name	Graham Hale
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Why do I have to register to make a response ?</p> <p>Is this a bureaucracy wall to prevent comment? Is it comment suppression ?</p> <p>Here are my comments anyway. Please register me and ad my comments to my registration.</p> <p>General comments.</p> <p>Developments like this make the South East ever more overcrowded and unhappy place to live.</p> <p>The government should follow a strategic plan of building new housing and industry in the north.</p> <p>A new town could easily be built in Yorkshire around the east coast main line and MI/A1 near Selby where communications and land are plentiful.</p>

I think it is wrong to try to add so much development on to the town so quickly. Services and transport will inevitably become over stretched and the quality of everything suffers.

There seems to be no measure of the quality of life impact on residents . High densities like these lead to social problems like crime and health problems both physical and mental.

Specific **Comments**

Rather than bolt industrial zones on to urban areas creating a sprawl, site these on existing suitable spaces in the wider countryside such as farm yards and other existing agricultural buildings . Match the rural architectural style and add landscaping.

Relocate the proposed industrial area beside the A41 . A 414 Two Water Road junction . This is on a hill top and will be an eyesore right across the town. Plus these fields are adjacent to the Boxmoor trust SSSI , they are wildlife rich and the development will impact massively on wildlife there. They should remain as managed meadow or incorporated into the Boxmoor Trust land as a Nature reserve zone on the urban edge.

Targets for affordable sustainable low carbon houses to apply to all developments

Consideration to be made to any development to fit in to existing urban scale building height and townscape.

Commit to re wilding of surrounding areas on a scale to the green land lost in order to balance loss of wildlife habitats.

Create targets for tree densities and hedgerow lengths within the Dacorum urban boundaries to protect mental health of Dacorum people and wildlife habitat.

Create a target for a minimum distance to green space from each doorstep. Say 200m

Make a definition of what constitutes green space based on area of land, fraction planted and variety of planting done

Included files

Title Question: Any other comment

ID EGS8330

Person ID 1266176

Full Name Francesca Ryde

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* **Yes**

* **No**

QUESTION ANY OTHER COMMENT comment	<p>I write to you regarding the Proposed Development in Long Marston for over 3,000 houses.</p> <p>Have you thought about the local infrastructure? The small country lanes already smothered in pot-holes, large vehicles ruining verges, encroaching on the ditches (to MINIMISE FLOODING), destroying wildlife? What about the farms already there, for hundreds of years, actually sitting on FLOOD PLAINS? What about the schools, the doctors surgery's, the already at capacity local hospitals and tiny train stations barely able to meet current capacity? The list could go on, but I am aware we are VERY SHORT OF TIME.</p> <p>Quite frankly this is ridiculous and has not been diligently thought through. As for the timeframe of LESS THAN A WEEK for objections to be raised and informing the landowners; it is an utter disgrace. You may have pressures from higher powers but seriously, have you not thought beyond that? You clearly have no heart for the people you are supposed to look over. Livelihoods will be lost, generations of farming destroyed, wildlife killed, local workforce's crippled, current locals needs disregarded, all for you to 'meet targets'. Good luck when the rain comes is all I can add. We live on clay!</p> <p>I urge you to reconsider your planning and your ultimatum timeframe. Have a heart.</p>
Included files	
Title	Question: Any other comment
ID	EGS8331
Person ID	1266191
Full Name	Mary Arnott-Gee
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I have just been made aware of this consultation which requires responses to be submitted by tonight.</p> <p>I am extremely concerned as I was not aware of this until now, and it is not possible to fill in the lengthy consultation document effectively in such a short time. Why has this not been widely publicised and circulated to all residents? It is hardly a fair consultation process, in my opinion.</p>
Included files	
Title	Question: Any other comment

ID	EGS8342
Person ID	1266200
Full Name	ROGER HANDS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Section 2.19:- Effective Recycling of Waste – What percentage of plastic waste that residents put in the recycling bin actually gets re-used? Is there still large consignments of plastic waste being shipped abroad to become someone else's problem? How is the council promoting to reduction of single use plastic?
Included files	
Title	Question: Any other comment
ID	EGS8351
Person ID	1266201
Full Name	Maggie Procopi
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Additionally I believe that the dissemination of information about the Plan around the residents of Berkhamsted has been sketchy to say the least. I am aware of many people who know nothing about it and do not believe that every household has been properly contacted with information.

Finally I would also like to say I am disappointed that our local MP, Gagan Mohindra, is remaining silent on the matter, and will be forwarding this email to him. The fact that developers, who stand to gain much from implementing the Plan, have been making sizeable donations to the Conservative Party is not a good enough reason for him not to represent the views of his constituents

Included files

Title Question: Any other comment

ID EGS8355

Person ID 211117

Full Name Mr Michael Heylin

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Section 2.19:- Effective Recycling of Waste – What percentage of plastic waste that residents put in the recycling bin actually gets re-used? Is there still large consignments of plastic waste being shipped abroad to become someone else's problem? How is the council promoting to reduction of single use plastic?

Included files

Title Question: Any other comment

ID EGS8362

Person ID 1265009

Full Name Sue and Paul Dupree

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	I do not think this plan consultation has been widely publicised as we have had no letters as residents to say what is happening for the village and we do not receive a free local paper in the village either and with reluctant to go to the local shops to buy papers due to the covid situation. I have not been out unless it is really necessary to protect myself and family. This information should have been addressed in a different way; due to the situation we have all been living under for a year now. Has there been a consultation meeting with in the village? I learnt about the plans from social media this weekend and not everyone has access to this media either. especially the older generation.
Included files	
Title	Question: Any other comment
ID	EGS8370
Person ID	1266205
Full Name	DI HAMMOND
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	Section 2.19:- Effective Recycling of Waste – What percentage of plastic waste that residents put in the recycling bin actually gets re-used? Is there still large consignments of plastic waste being shipped abroad to become someone else’s problem? How is the council promoting to reduction of single use plastic?
Included files	
Title	Question: Any other comment
ID	EGS8395
Person ID	1266222
Full Name	Paul and Helen Stephens
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>We also object to the way this consultation has been conducted during a national lockdown.</p> <ul style="list-style-type: none"> - Many people still do not know about it. - People without access to IT have been excluded. - People have not been told they can send a handwritten response by post. - There has been inadequate publicity
Included files	
Title	Question: Any other comment
ID	EGS8407
Person ID	1266232
Full Name	BARBARA FLINT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I would like to express my concerns with regard to the Local Plan and the consultation. First of all in this current period of crisis I think it would have been sensible to have extended the consultation period beyond the revised end date of 28 February.</p> <p>I am also concerned that, whilst numerous methods seem to have been used to disseminate information, the brochure clearly detailing all the areas of proposed building was not sent out to residents until the last week of February.</p> <p>We have been made to realise during the last year the vital importance of our local open spaces and the protection which needs to be maintained of our Green Belt and areas of outstanding natural beauty. Once these are lost they can never be recovered and are more and more essential to maintain and protect in our overcrowded island. I understand that local</p>

authorities have the flexibility to restrict the scale of development when impacts on Green Belt etc are taken into consideration. Surely another impact of the current crisis is a chance to re-think and reuse current office and brownfield sites before destroying further open or agricultural land.

Current environmental and infrastructure impacts should weigh heavily in all the planning decisions. The plans need to look carefully not only at the impact on roads, power, support agencies, water extraction and disposal etc but the wider requirements of such areas as climate change obligations.

I trust that this consultation is a realistic opportunity for concerned residents to express their opinions and that the ideas and thoughts of local people will be taken into account.

Included files

Title Question: Any other comment

ID EGS8419

Person ID 1266234

Full Name LUCY DUGDALE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

QUESTION ANY OTHER COMMENT comment

> — I am concerned that this consultation was launched during the second
> national lockdown of the pandemic and continued running despite a
> third national lockdown
>
> — I am concerned that many residents simply did not know this was
> going on — publicity was poorly planned and haphazard — Of the small proportion of residents who did get the brochure
- many believed they had no way of responding— it was not clear that postal responses were possible as the literature
only referred to using the portal or email - those without IT felt excluded.

> — Many people who care deeply about the loss of Green Belt did not
 > have time to research this and write a response during lockdown— they
 > were busy with working-from-home whilst home- schooling children as
 > well as dealing with the challenges of CV19 and lockdown — The lockdown
 > rules meant that people could not attend public libraries or The Forum
 > to view hard copies of the plan because this would entail making
 > unnecessary journeys which were unlawful during most of the period of this consultation — There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing — The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT — It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown — People expect consultations to involve public meetings where officers can explain what is proposed and answer questions — Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

Included files

Title Question: Any other comment

ID EGS8429

Person ID 1264223

Full Name Elaine Mercer

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment Although a resident of HP4 for 16 years I have struggled to find out the benefits of the new local plan or indeed anything about it. I have however been bombarded with communications from a Developer who wants to build over the farm at Bourne End. I have several points to raise about this:

1/. If a Developer who is from outside the area can manage to find addresses for residents - why can the people who collect a goodly amount of Council Tax from each and every address not manage this?

2/. The Developer's plans seem questionable to say the least. The number of houses and the Sports facilities, Primary School and local infrastructure are unlikely to fit comfortably onto the space earmarked. I am also concerned that they do not have a track record of delivering this scale of project. Their corporate website "Thakeham" (as opposed to the glittery micro site Bulbournecross) shows only modest sized developments and there is no evidence of local infrastructure being provided.

3/. The Houses the developer is used to providing are £500,000 plus. We have no shortage of these in the Borough. They cannot be considered as contributing to " Social Housing" or homes for vital key workers.

The portal for consultation if not fit for purpose. I tried many variations of my name and it kept saying username already taken. Why could the normal log in for comments on Planning Applications be used - are you trying to limit the number of people who comment?

I for one would have like to see a proper consultation period - and yes if it has to be lengthened by a few weeks because of the Pandemic then so be. AND please TELL people what is going proposed.

Included files

Title Question: Any other comment

ID EGS8430

Person ID 1266244

Full Name ALAN REEVES

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

QUESTION ANY OTHER COMMENT comment	This consultation should be stopped during this unprecedented times , it should not be taking place during lockdown , when we cannot attend meetings and have our voices heard .
Included files	
Title	Question: Any other comment
ID	EGS8433
Person ID	1266245
Full Name	LORRAINE REEVES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	This consultation should be stopped during this unprecedented times , it should not be taking place during lockdown , when we cannot attend meetings and have our voices heard .
Included files	
Title	Question: Any other comment
ID	EGS8452
Person ID	1266276
Full Name	BARBARA ANSCOMBE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS8466
Person ID	1264394
Full Name	Alan Frost
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	Your website is extremely difficult to use, is mostly platitudinous and does not give many hard facts. I trust that all information regarding the proposed housing site will in future be made widely available and publicised in Buckinghamshire whose residents will be more affected by the proposal than this in Dacorum.
Included files	
Title	Question: Any other comment
ID	EGS8477
Person ID	495878
Full Name	Ms Anna Hanson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am very concerned that amongst the wider Dacorum community there is a general lack of knowledge about the local plan and more importantly that the consultation period for it is about to close and as such people have missed the chance to comment on their future.</p> <p>Due to Covid restrictions it has not be possible to engage and inform people with events such as:</p> <ul style="list-style-type: none"> • Door to Door canvassing of the local plan consultation • Interested parties to meet and canvas at the various town markets <p>Covid restrictions have impacted</p> <ul style="list-style-type: none"> • Our ability to attend Council Meetings in person rather relying on access to online forums • Residents being able to meet and consider responses to the local plan <p>The Government has asked all of us to restrict our interactions with the general public as it is both irresponsible and unlawful to do otherwise.</p> <p>The council should extend this consultation by many more months, until the current crisis is over and an additional subsequent period be provide for the full engagement by all Dacorum residents. I feel the strategy has failed to take account of a number of important issues or has diminished their significance, most importantly - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs.</p>

The pursuit of economic growth should be balanced against and not override environmental concerns and climate obligations.

Included files

Title Question: Any other comment

ID EGS8487

Person ID 1266302

Full Name Gareth Garner

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

This is the most important decision for the community in a long time. Two clear issues which mean we must consider deferring this decision for at least 2 years:

- We are in a pandemic and the community and local businesses are already reeling from material personnel and financial challenges. It is simply not the right time for the community to have the time to make a decision that will impact everybody - how will a Nurse on the front line be able to respond to this now - is it fair they can't have a say?
- There is a housing challenge in the UK but right now it is unclear where the housing is needed post the pandemic. The data from 2018 already shows that there is no requirement for the level of housing So again not the right time to start destroying the Green Belt.

Included files

Title Question: Any other comment

ID EGS8509

Person ID 1265044

Full Name Joseph Price

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>I appreciate that the consultation period was extended, but the methods available for people to view, learn about, scrutinise, debate, and comment on this expansive local plan are simply not good enough. I am 31 years old, and I have found it very difficult to find the local plan, the right documents, navigate the website, and then finally leave comments (hence I have used this form and am emailing you). The lack of communications about the plan, and the lack of public meetings, will leave thousands of effected residents without a voice and without a change to participate. Whether you're for or against the plan, this is totally unacceptable and provides a very weak foundation for the process to continue.</p> <p>Having lived in Dacorum for nearly 4 years, I have always been a vocal supporter of the council – having found it to generally be effective. I feel particularly let down and angry with the nature of this consultation, as well as its proposals to destroy precious Green Belt land, which we will never, ever get back. Both of these things are really not acceptable, and I urge the council and those in positions of influence to stand up for the right thing. Then you will have the people behind you, and we will be able to achieve great things.</p>
Included files	
Title	Question: Any other comment
ID	EGS8518
Person ID	1265044
Full Name	Joseph Price
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	The pandemic has meant that normal methods of consultation could not take place. The measure put in place have gone some way to allowing engagement, but it has not been good enough by a long stretch. I am in my 30s, I am fully computer literate, and I found it very difficult to a) find the local plan, b) review the different sections, and c) leave comments (hence

I am using this form). I have no doubt that these methods, and the poor execution/lack of communication strategy, will mean that a significant proportion of residents will not be able to make their voices heard. This is totally unacceptable. The consultation should have been post-poned until restrictions allowed for public meetings to be held. This smacks of cowardice on behalf of the planners/councillors proposing this plan, and it shan't be forgotten or forgiven quickly.

Included files

Title Question: Any other comment

ID EGS8529

Person ID 1266467

Full Name Mr and Mrs D Bowra

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment I don't believe the consultation has been fair or inclusive under the Equality Act 2010 as I have not received, along with numerous other residents, the information packs some households have received. Luckily, family members have access to the internet and saw this information on Facebook but I strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet or the technical knowledge. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS8536

Person ID 1266478

Full Name JOHN ABERCROMBY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I object to the way this consultation has been conducted during a national lockdown. - Many people still do not know about it. - People without access to IT are excluded. - People have not been told they can send a handwritten response by post. - There has been inadequate publicity
Included files	
Title	Question: Any other comment
ID	EGS8539
Person ID	211354
Full Name	Mrs Laura Sanderson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Lack of Proper Consultation I have only heard of this "Consultation" via another Potten End resident. As the proposals will severely impact Potten End, I can only assume that you do not wish to consult the public, especially those to be adversely affected. We have not received any communication from the Council about this Plan and I can only conclude that it is so harmful to the environment, countryside, wildlife and quality of life for people that you want to sneak it through whilst we are all in lockdown.
Included files	
Title	Question: Any other comment
ID	EGS8557
Person ID	211354

Full Name	Mrs Laura Sanderson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I support everything said by the One Voice Alliance. I consider that there should be a moratorium on any further significant in housebuilding until the Borough has a healthcare system that is at least on a par with the national average and can then accommodate an increase in the population, and until there is a proper sustainable water and sewerage infrastructure that does not involve the desiccation of the local chalk streams and a cessation of our water supply in the summer months.
Included files	
Title	Question: Any other comment
ID	EGS8562
Person ID	1266562
Full Name	AMY CLAYTON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	- The way in which this consultation has taken place has not made it easy for people to respond and to communicate their views, partly due to the timing of it taking place during the national lockdown and also due to the website making it very inaccessible and complicated to respond online (I registered an account but despite several attempts encountered problems with trying to add comments, hence why I gave up and resorted to emailing directly instead).
Included files	

Title	Question: Any other comment
ID	EGS8581
Person ID	1266568
Full Name	CHRIS SALE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am writing rather lately to request that you severely delay your attempt to make any decision to put through the outlined plans to in my opinion severely damage the whole of the Dacorum area.</p> <p>Firstly I suggest you spend your time in working on how to help the local area recover from the Covid disaster and I would have thought this would utilise all the resources you have available.</p> <p>From talking to local people by phone I get the impression that few people have any idea of these proposed plans as they have both had more pressing matters of survival on their minds and no chance to meet up and discuss the matter with others. It should be necessary to wait until meetings can be called to discuss this matter which really will probably be 2022 at the earliest. This I believe should be done before any more public resources are wasted.</p> <p>Sorry so brief but will write in more detail later however I do want to register my opposition to this plan going forward until more notice and discussion has been arranged.</p>
Included files	
Title	Question: Any other comment
ID	EGS8593
Person ID	1264378
Full Name	Nicholas Kurth
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I attempted this morning to contribute to the Dacorum Local Plan consultation but after an hour, found the exercise impossible to penetrate via the website. Accordingly, I wonder if you would forward my comments below to the relevant individual. I received advice that in extremis my comments should be submitted to my Ward Councillor for forwarding - many thanks in anticipation. I live at (address removed).
Included files	
Title	Question: Any other comment
ID	EGS8599
Person ID	1265081
Full Name	Caitlin Neale
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Hello, I have just been made aware through Facebook friends of the consultation for the local plan. I am very concern that I have not received information about this from the council directly given the level of impact it will have on my local community and local area.</p> <p>I feel that the consultation period should be extend to a point when fair and transparent communication can be supported outside of covid conditions when all people can access the information and also have time to consider and respond. Covid condition mean that we are reliant on digital to communicate and now all people have access or easy access. There is also fair time considerations; for those who are juggling fulltime work and full-time childcare there is very little capacity to consider and respond to consultation on top of managing basic family responsibilities.</p> <p>I look forward to hearing your view on what steps you have taken to address these factors and hope you reconsider and further extend the consultation period.</p>
Included files	

Title	Question: Any other comment
ID	EGS8604
Person ID	1266586
Full Name	Chloe Milbank
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I am writing in relation to the huge development of housing currently in consultation for Dacorum, which I have only just become aware of, yet is only in consultation until the end of today. I have not received the booklet that was apparently delivered through residents doors. Had it not been for a concerned fellow resident sharing some information on social media, I would still be unaware of the consultation now.
Included files	
Title	Question: Any other comment
ID	EGS8610
Person ID	1266590
Full Name	LYNN LIGHT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I am very disappointed this consultation process is going ahead at a time where it is difficult for communities to meet/ discuss/ highlight issues. I definitely feel taken advantage of.

Included files	
Title	Question: Any other comment
ID	EGS8614
Person ID	1266595
Full Name	SHARON MACARTHUR-POWELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Please note I was not posted any information about this plan which is disgraceful given the impact this would have on the town. Very little consultation at all!
Included files	
Title	Question: Any other comment
ID	EGS8624
Person ID	1266595
Full Name	SHARON MACARTHUR-POWELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>Q9 Additional</p> <p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard — Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown — The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation — There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing — The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT — It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown — People expect consultations to involve public meetings where officers can explain what is proposed and answer questions — Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".</p>
Included files	
Title	Question: Any other comment
ID	EGS8634
Person ID	1266604
Full Name	SEB BELOE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment

Q9 Additional

- I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown
- I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard
- Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.
- Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home schooling children as well a dealing with the challenges of CV19 and lockdown
- The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation
- There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing
- The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT
- It was not possible for councilors or their teams to knock on doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown
- People expect consultations to involve public meetings where officers can explain what is proposed and answer questions
- Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

Included files

Title Question: Any other comment

ID EGS8636

Person ID 1266606

Full Name ANDREW CLARKE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
*** Yes**

* No	
QUESTION ANY OTHER COMMENT comment	<p>I think the process has been rushed, however I appreciate the chance to contribute.</p> <ol style="list-style-type: none"> 1. What plans do you have to improve the bus services including making under 15 ,travel free as in London. 2. What plans do you have to organise a yearly art/music event such as Tring Chillfest? All the surrounding areas have festivals etc and it would be nice to show off one of the countries oldest towns. 3.What plans do you have to provide places for young people to pass time. Activites that show off the talents of young people and build pride in Hemel? 4. What plans do you have to provide older residence entertainment such as cabaret evenings? <p>Most of this can be done in the open air at Gadebridge</p>
Included files	
Title	Question: Any other comment
ID	EGS8648
Person ID	1266607
Full Name	RACHEL POWELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown — I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard — Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home schooling children as well a dealing with the challenges of CV19 and lockdown — The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation — There was conflicting advice from the leadership of Dacorum Borough</p>

Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing — The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT — It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown — People expect consultations to involve public meetings where officers can explain what is proposed and answer questions — Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law ‘

Included files

Title Question: Any other comment

ID EGS8652

Person ID 1266622

Full Name Sally Fisher

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I am writing to express my views on the Dacorum Local plan proposals as a resident of Berkhamsted.

Timing

The timing of this consultation is wholly inappropriate whilst we are in the midst of a global pandemic which is likely to have a profound effect on the way in which we live, work, shop over the coming years and therefore it is extremely difficult at this present time to predict the requirements for the next year, let alone decade. This consultation should be paused for a period of at least 6-12 months, by which time it may be more feasible to predict future population trends, working habits, living and social requirements. Furthermore we are due to have a new census conducted this year and therefore it would make much more sense to conduct the consultation using the most relevant data from post Covid 19.

Included files

Title	Question: Any other comment
ID	EGS8685
Person ID	1266687
Full Name	Mr & Mrs Bruce and Jenny Finlayson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Finally we feel that many of the residents of Northchurch who will be affected by this proposal are not aware of the Plan. Due to lockdown any public noticeboards will probably not have been read and no communications have been posted to many residents, including us. We have just spoken to a resident of Darrs Lane, at 5.00pm today, and they have said that they received a brochure yesterday saying that they need to respond by this Sunday. We request that the period for consultation be extended.
Included files	
Title	Question: Any other comment
ID	EGS8712
Person ID	1231045
Full Name	Mrs & Mr Dixey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I understand not all residents received the information packs. I feel something of this importance should have been more widely distributed, after all not everyone has access to the internet.

Therefore, I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS8720

Person ID 1266741

Full Name stephen greenaway

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I don't believe the consultation has been fair, as numerous residents have not received the information packs that some households have received. I do not receive free local papers, and during the lockdown have not been out to see any information that may have been available (ie library). I know this information has been published on Facebook, but strongly feel something of this importance should have been more widely distributed, after all, note everyone has access to the Internet and with home-schooling, lots of tools/time has been taken up. Therefore I believe that consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS8725

Person ID 1266742

Full Name LAWRENCE SIMPSON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Firstly, I am disappointed that the only way I have found out about his development plan is through private social media channels. I have received no formal notification form the local council informing me of the plan or inviting me to offer my opinions on the developments. I consider this a dereliction of responsibility of local authorities to ensure people are kept informed.
Included files	
Title	Question: Any other comment
ID	EGS8733
Person ID	1266749
Full Name	FRANCES BUSH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The consultation process has been inadequate. I did not receive the information pack and only became aware of the consultation process on Facebook. The consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS8759
Person ID	1266765
Full Name	ANNE AMLOT
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	In addition, we received the document through our letterbox on Thursday Feb 25th. This gave us one working day to respond to a huge proposal, an insufficient time period to allow residents to object.
Included files	
Title	Question: Any other comment
ID	EGS8761
Person ID	1266766
Full Name	Helen Drew
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Holding consultation on so large a plan during lockdown denies the opportunity for community appraisals and meetings regarding the future development. This consultation period should be extended until proper community meetings can be held and plans and detailed models viewed. The maps sent out in the consultation pamphlet are deliberately lacking in detail and simplified almost beyond recognition. Each area's development isolated from the other so that the grand scale of over-development is hidden. This is undemocratic. You have been elected to represent us, not to disenfranchise us. There are many other issues to be addressed including environmental concerns. More OPEN consultation and time is needed.
Included files	
Title	Question: Any other comment
ID	EGS8766

Person ID	1266769
Full Name	LISA AND TRISTAN ROBINSON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Also many of us local residents never got any information on the plans and due to this and lockdowns this should be delayed and reviewed.
Included files	
Title	Question: Any other comment
ID	EGS8767
Person ID	865182
Full Name	Mrs Diana Lai
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I have only this evening been made aware of a Draft Local Plan which relates to the building of many thousands of homes on hundreds of hectares of Green Belt land in Dacorum BC. I have never received or seen sight of the above Local Plan and I assume there may be many other such residents. How was the Plan distributed and/or publicised?</p> <p>In addition, I understand that I have until 11.59pm today to make my voice heard before the consultation closes, a difficult task without sight of said Plan. I find it disingenuous of the Council to set a deadline for this consultation in such unprecedented times we find ourselves in, namely in the depth of a pandemic and substantial lockdown.</p>

I would urge the Council to give all local residents access to this Plan so that they can add their opinions to this important consultation, the outcome of which is of vital importance to us all.

Included files

Title Question: Any other comment

ID EGS8772

Person ID 1266775

Full Name Tim Waldram

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS8781

Person ID 1266779

Full Name Anna Peters

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p><u>Summary</u></p> <p>In summary I would like to see the Council, scrap the irresponsible existing plan and rework it based on latest ONS data, with a focus on protecting green belt and developing brown field sites instead. This would create a more realistic and productive plan that would not strain resource in the local area, immeasurably impacting the character of the towns of Berkhamsted and Tring's green borders and gateways. This would also allow some time in the future a proper public consultation when all members of the community regardless of access and knowledge of technology to review, understand the plans and respond fairly.</p> <p>I would also like to bring to your attention how poorly these plans have been advertised and how impenetrable the process of placing objections to the development has been. In my opinion this has prevented hundreds if not thousands of residents right to oppose and have their say, which is inexcusable. I know several people personally who have been unable to meet this deadline due to difficulty in navigating through the information provided and the objection process in general, which frankly is infuriating.</p>
Included files	
Title	Question: Any other comment
ID	EGS8787
Person ID	1266785
Full Name	Anthony Sutton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after

all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS8789

Person ID 1261814

Full Name Liz Uttley

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

First of all, I would like to state that the Officers who have put together this plan, have been exceptionally dedicated, and the 4 main documents of the plan, which are extremely detailed and extensive, reflect this hard work. The individual policies are clear, although the accessibility of the plan as a whole, and the consultation portal in particular could be improved.

Putting together a Local Plan for an area with the complexities of Dacorum, for a period of 18 years, and with an excessive housing target figure from MHCLG is a mammoth task, and the difficulties of bringing together all stakeholder and conflicting needs cannot be overestimated. The sudden onset of the pandemic, the likes of which have not been seen in living memory, can only have added to these difficulties, and I commend the Strategic Planning team for their perseverance in bringing this together despite these challenges.

Included files

Title Question: Any other comment

ID EGS8841

Person ID 1158356

Full Name Colin Blundel

Organisation Details Planning Officer
Chiltern Society

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Just as a conclusion: the Campaign for National Parks states that the government revealed a commitment to create new National Parks, one of which could be the CAONB. They recognise the value to the nation of open space and the key part it will play in a 'green recovery'. Therefore, there should be a pledge to protect and enhance local green spaces not wantonly destroy them by promoting excessive and unnecessary development.</p> <p>As the Open Spaces Society in their 'Vision for Planning' has stated: 'Government, Local Authorities and our communities must all work together to provide everyone with access to good quality greenspace closer to home, a vital element of a green recovery following the pandemic.'</p> <p>Dacorum, in its rush to publish a Local Plan, has ignored not only the government's questioning of its own housing numbers but also the effects of the pandemic which has changed how everyone lives.</p>
Included files	
Title	Question: Any other comment
ID	EGS8866
Person ID	1266808
Full Name	Fran Allen
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>I have found it difficult, technically, to respond to this consultation, and I consider myself fairly OK with IT and technology. For people that are not comfortable with IT, this will be a barrier to responding. It really should not be so difficult for ordinary people to respond to consultations about their local plans.</p>

Included files	
Title	Question: Any other comment
ID	EGS8868
Person ID	1266811
Full Name	Helen Bridal
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Covid-19 lockdown restrictions have made it very difficult for normal debate to be had on this matter, and the consultation period should have been extended to allow more people to understand the extent of the proposed developments and give them chance to respond. The process feels rushed, and an attempt to get a hugely divisive proposal given the green light without proper public scrutiny.
Included files	
Title	Question: Any other comment
ID	EGS8878
Person ID	1145563
Full Name	Mr Richard White
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	

QUESTION ANY OTHER COMMENT comment	The plan is overlong comprising mostly of platitudes with which no-one would disagree. It is written to deter scrutiny.
Included files	
Title	Question: Any other comment
ID	EGS8887
Person ID	1266824
Full Name	Linda Ralphs
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I object to the way this consultation has been conducted during a national lockdown. - Many people still do not know about it and too many are unaware of the drastic changes about to be forced on their standard of living. - People without access to IT are excluded.
Included files	
Title	Question: Any other comment
ID	EGS8911
Person ID	1266846
Full Name	Carla Michalik
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	

* No	
QUESTION ANY OTHER COMMENT comment	<p>I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up.</p> <p>I have had to email my response as the website does not work on mobile phone or tablet devices and I like many others do not have access to a laptop or computer.</p> <p>Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond to make this a fair & transparent process.</p>
Included files	
Title	Question: Any other comment
ID	EGS8914
Person ID	1266848
Full Name	Steven Hart
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.</p>
Included files	
Title	Question: Any other comment
ID	EGS8931

Person ID	1266862
Full Name	Clare and Andrew Tucker
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	We are writing to express concern regarding the proposed development plan for Hemel Hempstead and surrounding areas. In particular our attention is drawn to the number of houses to be built, and the fact that this is proposed on greenbelt land. We don't feel that we have had enough time / opportunity / information (especially given the current covid situation) to properly digest what is being proposed and the implications for our community's future. We believe more consultation with the public is required at a time when people are able to safely participate in a public forum and have the capacity to do so.
Included files	
Title	Question: Any other comment
ID	EGS8935
Person ID	1264607
Full Name	Clare Price
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I also believe that to have such an important consultation during the pandemic, has limited responses. Some of the local community are not aware of the plans and some have been unable to participate, if they do not have the technical awareness to do this online. It would be fairer to extend the consultation so that there could be a chance for everyone to view the plans in person.

The pandemic has had a serious impact on our local community and local businesses, as well as changing the world in ways we never believed possible. Now is not the time to make decisions that will seriously impact our future communities, when we do not know how, and how soon, our local area will recover.

Included files

Title Question: Any other comment

ID EGS8948

Person ID 1266884

Full Name TOM & CLAIRE DOUGHERTY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes
* No

Yes

QUESTION ANY OTHER COMMENT comment

2.Legitimacy of the consultation

The entire project has been deliberately inaccessible to the community that it will affect. Vast numbers of people I have personally consulted with in the area have had absolutely no idea about the proposed plan. There has been a distinct lack of awareness created. I only received the printed plan through the door on Friday 26th February – giving me 2 days to process the information! Consultation has only been possible for those with online capabilities and a large number of elderly and vulnerable do not even know about the project, let alone have the capacity to make comment on it. In no way can their lack of comment be deemed as an acceptance or endorsement of the plans, in fact it reflects their total unawareness of it.

As a minimum, the consultation period should be extended beyond lockdown and when a majority of the area has received it vaccines, to allow the public the chance to view plans, in a way that is accessible to all, and to have a realistic opportunity and timescale to make comment on the proposed plans.

Included files

Title Question: Any other comment

ID EGS8952

Person ID 1266886

Full Name	SIMON WEIGHTMAN AND DEBBI FIGUEIREDO
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Thank you for not informing us properly about this very important consultation about the future of our homes and countryside. Without the efforts of other citizens we would still be totally in the dark about your plans to concrete over our precious green belt to provide more housing units to bolster the profits of greedy developers.
Included files	
Title	Question: Any other comment
ID	EGS8973
Person ID	1266925
Full Name	Ms Sarah Edwards
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I have tried commenting using the portal but have found the process far too convoluted and so have resorted to sending this email response to the Dacorum Local Plan.</p> <p>Firstly, holding a consultation during a pandemic, and in fact during a lockdown, is not a proper consultation. Residents are more concerned with whether they still have a job when furlough ends, will they still have a business when lockdown ends, trying to homeschool and work at the same time or worrying about relatives in care homes. Those with little knowledge or access to the internet will only be aware of the plan if they received a leaflet through the post. The leaflet</p>

was so top-level in information that without access to the internet they would be oblivious to the true implications for their particular area.

Included files

Title Question: Any other comment

ID EGS8984

Person ID 1266934

Full Name Ms Sharon Mattingly

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Quite apart from the detail of the proposals, I believe that the consultation process has been entirely inadequate and a dereliction of the Borough Council's duty to its citizens. Information about the plans in Berkhamsted has been poorly distributed, with several streets not receiving the information either at all or not in good time. Additionally, the closure of the library and the inability to hold the usual information exhibitions means that many local people did not know about the plan, could not easily access the required information or get any answers to any of their questions. Finally, any resident without access to internet has had great difficulty in participating in this process. I strongly believe that Dacorum Borough Council should have, like many other councils, postponed the consultation process until after the lifting of lockdown, so that access to information was at the necessary level. Given the severity of the impact of these proposals on the quality of life in Berkhamsted, I think this is shocking behaviour on the Borough council's part, and renders the consultation invalid.

Included files

Title Question: Any other comment

ID EGS8998

Person ID 1266969

Full Name Ms Olivia Roberts

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS9010
Person ID	1267005
Full Name	Ms Kirsty Macdonald
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	This consultation has taken place whilst COVID 19 restrictions have been in place and many people have not been aware of it or able to respond it is totally unfair. I along with many others never received information regarding these plans by post or email and they should at least be put on hold and reviewed due to the volume of housing proposed.
Included files	

Title	Question: Any other comment
ID	EGS9038
Person ID	1264335
Full Name	Laura Clarke
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I can't believe that you are using housing projections from 2014; the economy and people's lifestyles have changed so much since then. I work for a marketing agency. Since lockdown, we have all worked from home and the owner of my company says that this is the way we will operate after lockdown finishes. Lots of my friends are working from home and do not want to travel into London every day again. I read all the time about big companies either closing their offices or relocating up north where rents are much cheaper. So, there is far less need for houses within commuting distance of London. You are destroying the Green Belt in Dacorum to build houses that are no longer needed.
Included files	
Title	Question: Any other comment
ID	EGS9040
Person ID	1264335
Full Name	Laura Clarke
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	I am 27 years old and live with my parents. I would love to buy a house here, but house prices are out of my reach. Your plans do not cater for me only for very rich people from outside Dacorum. They seem designed to make a fortune for property developers at the expense of people who live here.
Included files	
Title	Question: Any other comment
ID	EGS9042
Person ID	1267059
Full Name	Fiona Fulford
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am writing to strongly object to the current Dacorum Draft Housing Plan which is ending its consultation period tomorrow. I have submitted a response to the plan through the portal but found it very difficult to navigate. I consider myself reasonably computer literate but in order to submit any comments had to declare myself an organisation and then create myself as a consultee to myself! I am not sure if this was the correct method and did not want my input disregarded if I have submitted it incorrectly. Hence I am also writing an email to ensure my views are considered.</p> <p>Incidentally I believe the fact that this consultation has been concluded during lockdown, is a disgrace. Many of the local population have been disenfranchised by not being sufficiently computer literate, being too busy with homeschooling and working, or just not being aware of the deadline. The plan aspires to get neighbourhood buy in - this is a poor start.</p> <p>If this housing plan is not revised to halve the housing projections before going to the national government then we will be forced to take more than our fair share of home county housing growth. I call on you to protect the beautiful green belt in your borough and look forward to hearing from you</p>
Included files	
Title	Question: Any other comment

ID	EGS9051
Person ID	1267060
Full Name	HELEN EVANS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS9054
Person ID	1267061
Full Name	LAURA SPRINGATE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out

to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS9057

Person ID 1267063

Full Name ANN CONROY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS9062

Person ID 1267065

Full Name M BALAC

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I must also voice an objection to the very poor communication regarding alerting Dacorum residents to the deadlines for objecting to these proposals.</p> <p>The website is extremely difficult to navigate on a tablet or iPhone and laptop. I only found out about the 28th Feb deadline from accessing a local Facebook group by chance. This is wrong.</p> <p>To register and " have your say " is nigh on impossible for ordinary working people to understand and elderly residents to access. I do not think the community has be alerted to the plans clearly enough , it is dangerously lacking full transparency .</p>
Included files	
Title	Question: Any other comment
ID	EGS9082
Person ID	1146072
Full Name	Helen Cole
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Firstly I object to the fact that the consultation has taken place during a pandemic and that the closing date for comments is during a national lockdown. This will inevitably mean that many people will have been prevented from commenting because they are either unaware of the plan, or cannot access the material which is only available online. This will particularly discriminate against the older population and there is a danger that their views will not be heard.</p> <p>The way the online commenting system has been set up is also, in my view, going to result in fewer responses as it is extremely time consuming to navigate all the documents and the content is high on top level wordy statements and very low on actual detail. With many people struggling to find time to juggle work and home-schooling, the length of time</p>

required to respond to this consultation will prevent many from commenting. This does not mean however that they agree with the plan.

Included files

Title Question: Any other comment

ID EGS9116

Person ID 1267080

Full Name Louise Shenton

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I strenuously urge you to ...
1 Halt the Local Consultation Plan
2 Redraw the plan based on the recent housing densities achieved; and
3 Demand that housing targets are based on up-to-date estimates.

Included files

Title Question: Any other comment

ID EGS9145

Person ID 211352

Full Name Mr Andrew Sanderson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No	
QUESTION ANY OTHER COMMENT comment	<p>Lack of Proper Consultation</p> <p>To begin with I want to protest at the way this consultation has been conducted. For implications as significant and long-lasting, there should be public displays, models, presentations, debates and opportunities to discuss face-to-face with planning officers all the various aspects of this Plan.</p> <p>No doubt the pandemic is cited as the excuse of not doing so but it is not good enough. With vaccinations proceeding apace, it will only be a matter of weeks before it would be perfectly safe to hold such events.</p> <p>A delay that is but a blink of an eye compared to the enduring damage that the misguided aspects of this Plan will inflict upon us.</p> <p>I cannot understand how those in charge of this timetable can believe that true democracy is being served by pressing ahead with a process in a way which could be construed as avoiding public scrutiny and furthering interests other than those of the residents that the Council exists to serve.</p>
Included files	
Title	Question: Any other comment
ID	EGS9169
Person ID	211352
Full Name	Mr Andrew Sanderson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I support everything said by the One Voice Alliance.

I consider that there should be a moratorium on any further significant in housebuilding until the Borough has a healthcare system that is at least on a par with the national average and can then accommodate an increase in the population, and until there is a proper sustainable water and sewerage infrastructure that does not involve the desiccation of the local chalk streams and a cessation of our water supply in the summer months.

I urge you to revisit the many aspects of your current Plan mentioned above and NOT to rush to unsustainable development to the long-term detriment of the environment and its citizens who, ultimately, are supposed to be the beneficiaries of such a Plan and also the paymasters.

It is OUR agenda that should be the driving force: us and our successors.

Included files

Title Question: Any other comment

ID EGS9173

Person ID 1267157

Full Name FIONA MASTER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I was unable to submit online. I found the site difficult to access which I am sure will have prevented many residents from objecting. Due to Covid restrictions the plan consultation deadline should have been extended as proper public consultation was not possible. I only heard about it recently and have received nothing by post or email from DBC.

Included files

Title Question: Any other comment

ID EGS9179

Person ID 1265013

Full Name Naomi Wood

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	We also feel that holding a consultation in lock down does not give everyone the chance to take part, I only found out about the proposed plans a couple of weeks ago via social media and many of our neighbours are elderly without access to internet and email who were unaware of the plans.
Included files	
Title	Question: Any other comment
ID	EGS9180
Person ID	1267162
Full Name	A WALKER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	We also feel that holding a consultation in lock down does not give everyone the chance to take part, I only found out about the proposed plans a couple of weeks ago via social media and many of our neighbours are elderly without access to internet and email who were unaware of the plans.
Included files	
Title	Question: Any other comment
ID	EGS9190
Person ID	1267172

Full Name	Ms Jennifer Hackett
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I have made several attempts to register, log in and respond to the questionnaire on the Dacorum Local Plan via your website. But I have found this impossible to do as the system is not sending me the confirmation email that would let me log it. In simple words, the system does not work. It seems designed to make things difficult and then it refuses to function. In my view this is an egregious way to block any public comments.
Included files	
Title	Question: Any other comment
ID	EGS9199
Person ID	1267194
Full Name	Ms Miranda Heck
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I have been surprised how many residents are unaware of the proposals. In the current climate communication has been more limited and with the process of speaking up and responding seeming daunting to many, I fear the level of response you receive will be only the tip of the iceberg of people's opposition. It cannot be assumed that those you do not hear from are in support of the developments. I urge you to reconsider the numbers and the proposed sites before our way of life and our countryside is irrevocably damaged.
Included files	

Title	Question: Any other comment
ID	EGS9203
Person ID	1267199
Full Name	Mr & Mrs Ian and Jane Sayle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>As residents of Berkhamsted for nearly 20 years and one of us living in the area for over 50 years we would like to comment on the Dacorum Local Plan 2020-2038.</p> <p>Firstly, we would like to raise concern regarding the distribution of the plan. We had to contact the planning department in order to get a copy of the plan, we are aware of friends in the town who have not received the plan and elderly relatives in Potten End, who do not use the internet who also have not received the plan. We do not believe the Council have made every attempt to ensure all local residents are aware of what is being proposed.</p>
Included files	
Title	Question: Any other comment
ID	EGS9215
Person ID	1267203
Full Name	Ms Eileen Martin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
QUESTION ANY OTHER COMMENT comment	<p>Question 9: Do you have any other comments on the Plan?</p> <p>Yes I am concerned the Consultation may not be sufficiently representative of local people's views. It has not been possible to hold public meetings to explain the plans and allow debate. I believe more time is needed to further consider and hear from more people rather than rushing through a plan that could adversely affect the area and our real needs now and in the future.</p> <p>I am opposed to the Plan as it stands</p>
Included files	
Title	Question: Any other comment
ID	EGS9222
Person ID	1267246
Full Name	Mr Keith Buckle
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.</p>
Included files	
Title	Question: Any other comment
ID	EGS9225
Person ID	1267249
Full Name	Ms Caroline Hart

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS9249
Person ID	1264411
Full Name	Claire Wilson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files	
Title	Question: Any other comment
ID	EGS9269
Person ID	1267329
Full Name	MARTIN DAVIES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard — Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown — The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation — There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing — The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT — It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown — People expect consultations to involve public meetings where officers can explain what is proposed and answer questions — Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".</p>
Included files	

Title	Question: Any other comment
ID	EGS9278
Person ID	1267330
Full Name	Kat Worth
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard</p> <p>— Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home-schooling children as well a dealing with the challenges of CV19 and lockdown</p> <p>— The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation</p> <p>— There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing</p> <p>— The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT</p> <p>— It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown</p> <p>— People expect consultations to involve public meetings where officers can explain what is proposed and answer questions</p>

— Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

Included files**Title** Question: Any other comment**ID** EGS9310**Person ID** 1267339**Full Name** CHIARA MACDONALD**Organisation Details****Agent ID****Agent Full Name****Agent Organisation****Yes / No** Yes
* Yes
* No**QUESTION ANY OTHER COMMENT comment** I don't believe the consultation has been fair, as numerous residents have not received the information packs that some households have received. I do not receive free local papers, and during the lockdown have not been out to see any information that may have been available (ie library). I know this information has been published on Facebook, but strongly feel something of this importance should have been more widely distributed, after all, note everyone has access to the Internet and with home-schooling, lots of tools/time has been taken up. Therefore I believe that consultation period should be extended to ensure all residents are consulted and have time to respond.**Included files****Title** Question: Any other comment**ID** EGS9326**Person ID** 1259852**Full Name** Imogen Wagstaff**Organisation Details****Agent ID****Agent Full Name**

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I would also like to say that the process of responding to the consultation online was not straightforward and took over three hours of my time to navigate and respond, at a time when I am already stretched trying to juggle my work and home schooling my children, alongside the other pressures of lockdown. I made this time because I have such strong objections to this, but many other people may not have been able to find this time and therefore the timing of this consultation is very misjudged and will not give you a fair representation of the views of local people. I would strongly urge you to increase the timescales for this consultation, otherwise I don't think that you can honestly say that you have given local communities a fair opportunity to comment and engage in these proposals.
Included files	
Title	Question: Any other comment
ID	EGS9339
Person ID	1267358
Full Name	Samantha Chamberlain
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I feel all decisions should be made when lockdown is over and more people can attend council meetings etc So many people have not heard about this plan and feel it is unjust currently to expect the public to make a decision when so many people are unaware of this happening.
Included files	
Title	Question: Any other comment
ID	EGS9340
Person ID	1267359

Full Name	Neve Waters
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Council withdraw the local plan that is currently under consultation. Unfortunately the pandemic has not allowed the correct level of public engagement to take place on a matter that effects each and every one of your residents until 2038.
Included files	
Title	Question: Any other comment
ID	EGS9356
Person ID	1267365
Full Name	Mr Jont Cole
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS9371

Person ID 1267367

Full Name Sarah Johnson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown

— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard

— Of the small proportion of residents who did get the brochure - many believed they had no way of responding as it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without internet access felt excluded.

— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst homeschooling children as well as dealing with the challenges of CV19 and lockdown

— The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation

— There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing

— The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT

— It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown

— People expect consultations to involve public meetings where officers can explain what is proposed and answer questions

— Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

In summary this feels like a proposal that takes no consideration to the real needs and concerns of the population the DBC claims to represent.

Everyone of those people who vote for those Council members who have had a hand in this are being ignored for a chance to make vast amounts of money for developers and themselves.

It is a truly shameful, poorly conceived plan but pushing it through deliberately at the height of a pandemic in its third lockdown is disgustingly craven and disrespectful to those members of the community who have lost loved ones. I thoroughly reject this proposal and the actions of those who have proposed it!!

Included files

Title Question: Any other comment

ID EGS9385

Person ID 1267368

Full Name Peter Leighton-Murray

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard</p> <p>— Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown</p> <p>— The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation</p> <p>— There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing</p> <p>— The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT</p> <p>— It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown</p> <p>— People expect consultations to involve public meetings where officers can explain what is proposed and answer questions</p> <p>— Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".</p>
Included files	
Title	Question: Any other comment
ID	EGS9399
Person ID	1267370
Full Name	Patricia Beloe

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard</p> <p>— Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home schooling children as well as dealing with the challenges of CV19 and lockdown</p> <p>— The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation</p> <p>— There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing</p> <p>— The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT</p> <p>— It was not possible for councilors or their teams to knock on doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown</p> <p>— People expect consultations to involve public meetings where officers can explain what is proposed and answer questions</p> <p>— Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".</p>
Included files	
Title	Question: Any other comment
ID	EGS9404

Person ID	1267391
Full Name	JAMES WOODS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I object to the way this consultation has been conducted during a national lockdown. - Many people still do not know about it. - People without access to IT are excluded. - People have not been told they can send a handwritten response by post. - There has been inadequate publicity
Included files	
Title	Question: Any other comment
ID	EGS9428
Person ID	1267395
Full Name	SIMON WEBB
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Against: Absolutely no opt out for developers, for final get out of jails points for developers not to meet the plans requirements are unacceptable.
Included files	

Title	Question: Any other comment
ID	EGS9450
Person ID	1267398
Full Name	Alexandra and James Donaldson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard — Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown — The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation — There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing — The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT — It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown — People expect consultations to involve public meetings where officers can explain what is proposed and answer questions — Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law"</p>
Included files	
Title	Question: Any other comment

ID	EGS9457
Person ID	1267401
Full Name	JACKIE BELLAMY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> • I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown • I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard • Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded. • Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home schooling children as well as dealing with the challenges of CV19 and lockdown • The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation • There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing • The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT • It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown • People expect consultations to involve public meetings where officers can explain what is proposed and answer questions • Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, <i>"reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law"</i>.
Included files	

Title	Question: Any other comment
ID	EGS9490
Person ID	1267417
Full Name	Wendy and Paul Goodridge
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard</p> <p>— Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown</p> <p>— The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation</p> <p>— There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing</p> <p>— The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT</p> <p>— It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown</p> <p>— People expect consultations to involve public meetings where officers can explain what is proposed and answer questions</p> <p>— Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".</p>
Included files	

Title	Question: Any other comment
ID	EGS9492
Person ID	1157289
Full Name	Rodney O'Callaghan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment

ID	EGS9504
Person ID	1267419
Full Name	Eric White
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Unfortunately at Wednesday night's Dacorum council meeting the motion to extend the Local Plan consultation period to take account of the ongoing Covid restrictions was rejected, seemingly along party lines for: 20, against: 27.</p> <p>The council is seeking to railroad this developer's charter through. The appalling lack of an evidential base and forward planning to account for even the basic elements of public infrastructure means the council needs the public's help more than ever. It needs to formulate a creditable plan and do some proper consultation and research.</p> <p>The 'winner takes all' approach has got to stop, and a collaborative approach is desperately needed for the good of the region.</p>
Included files	
Title	Question: Any other comment
ID	EGS9511
Person ID	399324
Full Name	Ms Julie Hollway
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	

QUESTION ANY OTHER COMMENT comment

Why on earth are DBC and the government pushing through this consultation when we are in a time of such huge change. Brownfield sites have become available which could be used for housing and there seems a pressure to speed through an incorrect process with **INCORRECT NUMBERS OF NEEDED HOUSING** in the borough.

By contrast, in October 2020, Buckinghamshire Council withdrew the Chiltern and South Bucks local plan in part due to Covid-19, noting that a revised plan would be drawn up to "*reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law*".

(<https://buckinghamshire.moderngov.co.uk/ieListDocuments.aspx?CId=336&MId=16533&Ver=4>, agenda item 7). DBC's decision to push ahead with a draft plan in circumstances where, as the government has stated "*the way that the country lives, works and travels continues to change more rapidly than at any time since the war*", appears misguided, both from the perspective of ensuring that a proper consultation takes place, and from the perspective of the need to address the changes wrought on residents' way of life, and consequentially our planning needs, by the pandemic. ('*Government response to the local housing need proposals in "Changes to the current planning system"*', December 2020 (announcing decisions following planning consultation launched in August 2020) (Government December 2020 housing need consultation outcome)

<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system-to-respond-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>) As the government notes, "*This has implications, for example, on demand for commercial and retail floorspace in our cities and urban areas. We want our towns and cities to emerge from the pandemic renewed and strengthened – more beautiful, more healthy, more environmentally sustainable and more neighbourly places, with greater public and private investment in urban housing and regeneration*". (Government December 2020 housing need consultation outcome.)

The development around Berkhamsted will disproportionately impact on the village of Northchurch. Northchurch is a separate village to the town of Berkhamsted with its own Parish Council and a small historic centre. That fact is scarcely acknowledged by the draft Local Plan simply treats Northchurch and the sites within it (including Bk06 and Bk07) as an extension of Berkhamsted, newly billed "*West Berkhamsted*" (Dacorum Emerging Strategy for Growth (2020 - 2038), p.230. By contrast, the Local Plan treats locations such as Markyate, Bovington and King's Langley as villages where concerns around sustainability, congestion and the restricted range of services and facilities mean that development should be limited. (E.g. pp.66, 247.). At present, Northchurch is known to suffer from air quality problems, and has a declared Air Quality Management Area (AQMA) in the High Street, signifying that national air quality objectives are unlikely to be achieved. Adding extra traffic burdens to the village (which also has no excess parking capacity) will reverse the recent small improvements in the air quality recorded at that location (Appendices to Interim Sustainability Appraisal Report, p.22: it is noted that there is only one 'normal' year (2019) of data in which the air quality at the location improved. Although DBC reported that NO2 concentrations remained below intervention limits in 2020, the periods of lockdown are likely to mean that the year is not representative.)

Like Berkhamsted generally, it also suffers from a lack of open space within the town. (Berkhamsted (including Northchurch) has the second lowest level of current provision in the borough. DBC Open Space Study Assessment Report, July 2019, Table 6.1 (p.31),

https://www.dacorum.gov.uk/docs/default-source/strategic-planning/open-space-study-assessment-report-july-2019.pdf?sfvrsn=f6e0c9e_4.

) In those circumstances, the public rights of way into the Green Belt countryside around Northchurch (such as that which runs off Bell Lane through site Bk06 - known by local residents as the 'Wishing Tree field' - see further below) are

extremely valuable. The sudden decision by DBC in early 2020 to close all pedestrian access from South West Berkhamsted across the A41 has made such space still more important. While it is proposed that certain sites within the draft Local Plan (including Bk06) should include new public spaces within them, that is far inferior to the ability to gain direct access to the open countryside of the Green Belt. These proposed green spaces, which will inevitably be small, are a poor substitute for open country.

Included files

Title Question: Any other comment

ID EGS9514

Person ID 1264642

Full Name Jean Mack

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

a) the lack of transparency and inadequate presentation of the plans during a pandemic when opportunities for scrutiny and discussion are limited.

This plan requires full scrutiny and discussion by the local community. At the moment, this is impossible because of the restrictions necessary due to the Covid pandemic. The Council's online presentation of its plan is woefully inadequate to the point of seeming deliberately obfuscating. The maps of areas where development is planned are lacking labels and scale, for example, and are incredibly difficult to interpret. The links on the site to enable viewers to access "What People Say" do not work. The whole presentation, with its assertions of environmental sustainability and economic prosperity for all (but no clear route to how this is achieved), is a prime example jargon-riddled boosterism. It lacks any serious consideration of how the needs of the world and this locality in particular may have shifted fundamentally in a new era of heightened environmental concern and post-pandemic economic restructuring.

For the Council to pursue this plan recklessly and without further full consultation would be a gross infringement of local democracy and our rights of participation in decision making.

Included files	
Title	Question: Any other comment
ID	EGS9516
Person ID	1267424
Full Name	Laura Goss
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Firstly I would like to object to your timing for these planning proposals during this current pandemic. It is extremely problematic to travel to view sites plans and attend meeting in these extraordinary living conditions due to covid pandemic and restrictions. This will have greatly affected the way people can be contacted and difficulty especially for the elderly who are shielding and many who are not familiar with using a computer and are therefore unaware of these new planning developments. I feel that this is a crafty manoeuvre by Dacorum Borough Council! to pass this with little protest.
Included files	
Title	Question: Any other comment
ID	EGS9540
Person ID	1267431
Full Name	Mr & Mrs Williams
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>I managed to track down your Dacorum Local Plan leaflet and found it to be very uninformative. There was not enough detail to for me to even begin to consult on.</p> <p>In fact when it came to the pages of maps it was very unclear what your plans are. Just colouring something a 'growth area' doesn't help.</p> <p>But this email isn't to complaint about your leaflet or the complicated portal.</p>
Included files	
Title	Question: Any other comment
ID	EGS9542
Person ID	1267432
Full Name	David Fox
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>I am writing to strongly object to the current Dacorum Draft Housing Plan which is ending its consultation period tomorrow. I have submitted a response to the plan through the portal but found it very difficult to navigate. I consider myself reasonably computer literate but in order to submit any comments had to declare myself an organisation and then create myself as a consultee to myself! I am not sure if this was the correct method and did not want my input disregarded if I have submitted it incorrectly. Hence I am also writing an email to ensure my views are considered.</p> <p>Incidentally I believe the fact that this consultation has been concluded during lockdown, is a disgrace. Many of the local population have been disenfranchised by not being sufficiently computer literate, being too busy with homeschooling and working, or just not being aware of the deadline. The plan aspires to get neighbourhood buy in - this is a poor start.</p> <p>If this housing plan is not revised to halve the housing projections before going to the national government then we will be forced to take more than our fair share of home county housing growth. I call on you to protect the beautiful green belt in your borough and look forward to hearing from you</p>
Included files	
Title	Question: Any other comment

ID	EGS9548
Person ID	1267433
Full Name	John McDonough
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<ol style="list-style-type: none"> 1 I have only recently heard about this consultation and it feels very rushed. Why would you rush something as important as this? Speaking to other people locally, they have only recently heard about it too. For a genuine consultation, you want as much consultation as possible. If you do not want a genuine consultation, but would rather hush / rush something through, then this is a problem, given staff and counsellors at Dacorum Council are there to serve residents. 2 The middle of a global pandemic and lockdown, with the challenges around communication and on many peoples time, both working and home schooling, is not going to get the best from people, including in terms of attention, understanding, facilitating debate and giving concerned parties the opportunity to explain their perspectives. The consultation on the web was difficult to find, is not user friendly and I do not have time to go through so many different sections at such late notice. 3 Whilst we have seen an appetite from national government to rush things through, not listen to experts and avoid explanation, debate and scrutiny, that same approach cannot be adopted to local government and there is a danger that this looks like it may be the attempt.
Included files	
Title	Question: Any other comment
ID	EGS9557
Person ID	1267439
Full Name	Sharon and Paul Heideman
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.</p> <p>I would further add that these plans in content and in terms of the process being followed are insensitive to the unique situation the borough's residents are in - green spaces have NEVER been more vital to the social and mental wellbeing of the people of the borough than they have been this past year. This Plan attacks that which has acted as the sole respite for many people struggling with the isolation and mental devastation of this past year.</p>
Included files	
Title	Question: Any other comment
ID	EGS9558
Person ID	1264246
Full Name	Steve Burdekin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Firstly, to not extend this consultation to when lockdown is over is contemptuous leadership, and shows the complete lack of consideration towards local residents.
Included files	
Title	Question: Any other comment

ID	EGS9568
Person ID	1267442
Full Name	Teresa Adams
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>I would like to ask where has DBC publicised this consultation?</p> <p>I believe A public consultation can only be held if the public are :</p> <p>1) Aware it is taking place.</p> <p>2)The local plan is accessible to view by ALL.</p> <p>As a local resident (born & bread in Berkhamsted) I have not received any leaflets/ literature from Dacorum Borough Council re The Local Plan and Consultation.</p> <p>That they have been holding during a National Lockdown.</p> <p>I was made aware of it by The Liberal Democrat Party.</p> <p>I feel this is a disgraceful abuse of the Current Global Pandemic by DBC.</p> <p>DBC leaders are well aware of the Governments laws/restrictions and advice we are All being told we must follow.</p> <p>We are currently in the third National lockdown.</p> <p>It is law to stay at home other than for essential shopping,medical appointments ,work if you can't work from home.</p> <p>Can DBC kindly tell me where in the lockdown rules it deems it essential to leave home risking your health and the NHS to go to the library to view your local governments Local Plan?</p> <p>Please see Berkhamsted's Library's own lockdown literature re booking & quarantine rules.</p> <p>Dacorum Borough Council should have foreseen holding the Consultation during a Global Pandemic ,during a National lockdown would be excluding all those that are already disadvantaged (the poor and the elderly)by not having access or use of the internet,to express their views and take part in a consultation that affects them and shapes the towns they live in,many grew up in.</p> <p>DBC should have postponed the consultation until we are out of lockdown and it was legal and safe for all to view the local plan.</p>

DBC a should have postponed the consultation until Berkhamsted town hall was allowed to open & could safely display the local plan.

I ask that DBC admit you have not given the residents of the borough who you are elected to represent any fair chance to consult on the local plan or have their views heard.

Included files

Title Question: Any other comment

ID EGS9585

Person ID 1267450

Full Name Mrs Ruth Taljaard

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I cannot navigate your website. It is not well designed. Please find my feedback below - which is submitted BEFORE the deadline.

I understand that growth is inevitable, but it MUST be done WELL:

If you develop Lock Field, Northchurch then I have the following comments:

- You MUST also develop NEW ROAD. This pathway is already NOT SAFE. My children have to walk along it to go to their school (St Marys CofE) and I often get hit by van side mirrors as they pass. Imagine if that was a child!!!! The pathway needs to be widened, even at the cost of vehicles. Our children's safety is paramount!
- You MUST develop the bridge on New Road. It is a single track bridge over the canal. Yes it is beautiful to look at. But it is not SAFE, especially for our children. There is no safe way to cross the road from the path to the canal path. This bridge must be developed into something that is safe for our children to walk across and over. Especially as there is a school next to it.
- The canal path must be upgraded. It gets so muddy in the winter. It must be pathed or concreted in order to sustain the proposed increased foot-fall.
- I don't think that one road access to a residential area is wise. I think two ways in and out is safer.

- Cars already SPEED down New Road and the High Street - especially near the school and the Northchurch playing fields. What do you propose to do to keep cars and all this new traffic obeying the speed limit and keeping our children safe? Especially with the proposed new amount of vehicles to be using it.
- You MUST develop at least a footbridge (with cycle path) over the canal and river, across from Lock Field over to the Northchurch playing fields/Tesco. This will keep any children who then live in Lock Field safe, away from the roads, so they can visit the park/shops without having to use the VERY DANGEROUS New Road and High Street pathways.
- If children live on Lock Field - you must also develop the footpaths on the High Street as well. Children will want to access Tesco and the Northchurch Playing fields. People park cars on pathways, which are already un-safe, small as it is. There have been times I've had to push my babies in a pram IN THE ROAD due to cars being parked on the pavement! You MUST double-yellow-line all along those pathways!
- You are developing a 'green-belt' area. Firstly, by doing this you are making your 'rules' void. How do you expect anyone in Dacorum to respect you, believe what you say or take you seriously if you develop on a 'green-belt' area? Secondly, how do you plan to keep it 'green'? Are you asking the construction company to include minimum of 2 trees and 3 shrubs per home?
- Instead of building 60 tiny homes that are ugly and bad for the environment. What about building 40 homes that have larger gardens, more trees and shrubs and keep the area vaguely 'green'?
- Will the new houses be 'green' in the sense of - they will all have solar panels and other sources of renewable energy? It is a green-belt area.
- I'm no wild-life expert...but this is not an urban area (such as an old factory in a city being replaced with residential) - this is countryside. Many animals will live there. I myself have seen king fishers, ducks, herons, foxes, badgers, and much more wildlife along that stretch of the canal. You are killing their homes. Not only in the long run, but in the short term - while all the horrible machines are there digging and making noise. What are you doing to protect the wildlife that lives here? Are you planning on keeping a minimum 10 meter wildlife 'belt' between the canal and any potential housing? If this 'belt' is grass - will you plant more trees and shrubs to encourage wildlife to return after the bombardment of a building sight?
- You must add a footpath from Lock Field into Ashridge. So people can walk directly from Lock Field into Ashridge without having to use the foot path on New Road - again, this is too thin and not safe compared with the speed of traffic.
- Everywhere in Berkhamsted and Northchurch there are parking issues. Please can you design the new residential area to cope with the amount of vehicles. For example, plan houses to have ample driveways and garages for residents and guests. And double yellow the surrounding roads to STOP people from parking on footpaths. This is not safe for children. Again, if making safe footpaths means building 40 houses rather than 60 - then do it. Make this estate so that bin lorries and fire engines can EASILY drive everywhere (whilst keeping their bin collectors safe!)
- What about social responsibility? Is this new estate designed for middle and upper-class people? Or is it for everyone? Even working class? Are you mixing social housing between the large detached houses?

- How are you planning to future-proof this estate? Are you planning footpaths to be wide enough for two wheel chairs to pass each other safely? This would also be a safer width of path in case there is another pandemic and people have to keep 2 meters away from each other. Are you adding cycle paths? I think if you are serious about the environment then you should include cycle paths EVERYWHERE - even on New Road and the High Street. Even if cycling does not prove to be popular - you are future-proofing this space for things such as hovercrafts or the food-delivery-robots that you see even today in Milton Keynes. Everywhere footpath in Berkhamsted FAILS for safety. Lets make this new estate safe.
- Repair local roads after development. As seen on the new estates up Durrants Lane - the amount of construction traffic (and its pollution) has ruined the roads. Will you repair and redevelop the roads after this estate has been built?
- All of these new houses (both in Berkhamsted, Northchurch, Tring etc) will create a LOT more traffic on the road. How do you plan to future develop the T-junction next to St Marys School between New Road and the High Street? There is no safe crossing for children over New Road AT ALL! And it is next to a school!!!!
- You MUST develop the infrastructure. How will you develop the Tesco shop parade and parking to deal with greater numbers? How will you develop local doctors and dentists to deal with greater numbers? Which hospitals are due to take on these greater numbers of people and how are you contributing to their development too?

To summarize; I know that growth is inevitable. But you MUST do it WELL and RESPONSIBLY, for the future of our area, our children and our wildlife.

I'm more than happy to talk to someone or detail my thoughts further. I'm happy to provide photographs of cars parked on pathways everywhere, videos of cars nearly hitting myself and my children walking to school etc etc.

If you build this Lock Field estate then do it WELL. Be innovators, be planet-protectors, be an inspiration to other areas who seek to grow too.

Included files	
Title	Question: Any other comment
ID	EGS9590
Person ID	1267454
Full Name	Sharon Letherman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
QUESTION ANY OTHER COMMENT comment	Also the consultation process itself has been limited by the pandemic and poor communication from DBC. People have not received DBC's brochure and are unable to communicate fully. Many are not aware of these Local Plans.
Included files	
Title	Question: Any other comment
ID	EGS9593
Person ID	1263214
Full Name	Mr R Pope
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>We am writing to lodge a complaint about the current Dacorum Local Plan consultation. I DO NOT comprehend why you see fit to proceed with such an important consultation in the middle of a national pandemic.</p> <p>The first we heard of this consultation was on the afternoon of Tuesday 23rd February when a leaflet from our local Liberal Councillor (Lara Pringle) was posted through my door. I telephoned Dacorum Planning on the following morning and fortunately a Planning Officer rang back and agreed to send out your consultation brochure. This duly arrived on Thursday, leaving me with only 3 days in which to submit any comments. I was informed that it was unfortunate that we had been overlooked when this document was distributed.</p>
Included files	
Title	Question: Any other comment
ID	EGS9594
Person ID	1267455
Full Name	Ms C Wilby
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>We am writing to lodge a complaint about the current Dacorum Local Plan consultation. I DO NOT comprehend why you see fit to proceed with such an important consultation in the middle of a national pandemic.</p> <p>The first we heard of this consultation was on the afternoon of Tuesday 23rd February when a leaflet from our local Liberal Councillor (Lara Pringle) was posted through my door. I telephoned Dacorum Planning on the following morning and fortunately a Planning Officer rang back and agreed to send out your consultation brochure. This duly arrived on Thursday, leaving me with only 3 days in which to submit any comments. I was informed that it was unfortunate that we had been overlooked when this document was distributed.</p>
Included files	
Title	Question: Any other comment
ID	EGS9610
Person ID	1267456
Full Name	David Sidebottom
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> I have only recently been made aware of the development through word of mouth and have not received a brochure. I live on [SENSITIVE INFORMATION REMOVED] which has many retirement properties and I am now aware of others who have only just been made aware, some who do not have internet access. There has been a major lack of communication between the council and local residents regarding the plan, with limited effort to publicise the plans to residents. This has further exacerbated further as we are in full lockdown – the council has failed to make adequate provisions to either publicise the plans during lockdown or allow for full public consultation. Unfamiliar Zoom meetings are not

inclusive for the public, decisions regarding the local plan should not be going ahead until lockdown is lifted and ALL members of the local community can contribute.

- Additionally, I have received 2 pieces of impressive marketing literature through the post from developers for Bullbourne Cross which highlighted what they believe are the benefits of this proposal. So after this, when I was made aware of the local plan from friends, I assumed they were related and wasn't sure if they were the same thing. It is confusing for residents to differentiate between 2, especially when DBC has made insufficient efforts to publicise the local plan. I had to seek clarification on both – it is thoroughly confusing

Included files

Title Question: Any other comment

ID EGS9613

Person ID 1151590

Full Name Lynda Clarke

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Firstly, I would strongly like to emphasise my displeasure at the poor consultation process. I was only made aware of this very important consultation a few days ago by social media and feel many local Councillors have done a very poor job both in making us aware and helping us understand the rationale behind this Plan or the tactics they are employing to get the best outcomes for our area. I have had very little time to prepare a proper response so have had to submit the best I have had time to do, below. However, **I would like it to be recorded that in addition to my response below I completely support the more detailed submissions made by Berkhamsted Citizens Association and Berkhamsted Residents Action Group together with the comments broadly made locally and nationally by the Campaign for the Protection of Rural England.**

Included files

Title Question: Any other comment

ID EGS9653

Person ID 400471

Full Name	Mrs Ruth Constable
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Local Plan needs to be reassessed in the light of</p> <ol style="list-style-type: none"> 1 housing need in the borough and in Tring specifically 2 the potential for development within Tring's current boundaries 3 opportunities for cross-county cooperation. <p>If Green Belt land has to be released, it should not be for the sites TR02 and TR03 which are of national importance (AONBs).</p> <p>Provision of more housing in Hemel Hempstead would avoid taking a large proportion of Green Belt land; and this would be a more sustainable option as it would avoid the necessity of commuting from Tring, where there are fewer jobs.</p>
Included files	
Title	Question: Any other comment
ID	EGS9686
Person ID	1267468
Full Name	Chris Berry
Organisation Details	CPRE Hertfordshire
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	

QUESTION ANY OTHER COMMENT comment	The Emerging Strategy should set out how local communities are being, or will be, engaged more fully in the future. We are clear that strong local vision and engagement will lead to better plans and proposals which should reflect enhancement of both natural and historic environments as well as sustainable development for future generations.
Included files	
Title	Question: Any other comment
ID	EGS9730
Person ID	1267481
Full Name	Diana Holliday
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I object to the way this consultation has been conducted during a national lockdown. - Many people still do not know about it. - People without access to IT are excluded. - People have not been told they can send a handwritten response by post. - There has been inadequate publicity
Included files	
Title	Question: Any other comment
ID	EGS9734
Person ID	1267483
Full Name	Paige Lester
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS9744
Person ID	1267503
Full Name	Lisa and Jeremy Davies
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	We also feel people have not been made aware of the very tight deadline for this proposal and ask you to give us more time to make people aware of these unwanted developments.
Included files	
Title	Question: Any other comment
ID	EGS9751
Person ID	1264471
Full Name	Ashley Hall
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I am opposing the plans set out. Not only have residents had insufficient time to see the plans many residents in the community have been completely unaware of this proposal.
Included files	
Title	Question: Any other comment
ID	EGS9757
Person ID	1264414
Full Name	Elaine Ridgway
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS9778
Person ID	1267528
Full Name	Clare Williams

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Firstly, I would like to record my opposition to the proposed development at Bulbourne Cross. I am very concerned about the level of marketing they have been able to use and wonder how this is allowed as separate to the overall plan, if Dacorum borough council are not allowed to market in the same way then surely this is unfair competition.</p> <p>I also want to record my opposition to the scale of the proposed Local plan at Berkhamsted due to the fact that it includes building on green belt land and does not adequately address the issue of increased traffic and pollution in such a small town.</p> <p>I would also like to request that more council housing is built and smaller more affordable housing rather than all the huge very expensive housing that seems to be evident in the current housing development off shooters way.</p> <p>I am pleased to see proposals for new schools but we need more on accessibility into the town for all (bus routes and safe cycle paths).</p> <p>I would also like to comment that the website for making comments online to the proposal was very difficult to navigate, I tried several times but had to come back to email.</p>
Included files	
Title	Question: Any other comment
ID	EGS9779
Person ID	1267529
Full Name	Lydia and Don Carmichael
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	

QUESTION ANY OTHER COMMENT comment	<p>We are lodging our objection to the above proposal and call for the consultation to be immediately stopped.</p> <p>We feel we have been excluded from the consultation for the following reasons:</p> <ul style="list-style-type: none"> • We are in a pandemic and we are currently shielding • We are in our 80's and need some assistance with navigating the information on the internet regarding the growth proposals. We are unable to get such assistance due to shielding and lockdown. • We received the brochure through the post on 25th February - 4 days before the end of the consultation, therefore we have no time to fully inform ourselves and write a full objection • Ordinarily we would have attended community meetings to find out more, but this has not been possible due to lockdown and shielding
Included files	
Title	Question: Any other comment
ID	EGS9797
Person ID	1267544
Full Name	CATHERINE HAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> • I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown • I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard • Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded. • Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home schooling children as well as dealing with the challenges of CV19 and lockdown

- The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation
- There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing
- The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT
- It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown
- People expect consultations to involve public meetings where officers can explain what is proposed and answer questions
- Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, *"reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law"*.

Included files

Title Question: Any other comment

ID EGS9805

Person ID 1263842

Full Name Karen Roberts

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Included files

Title Question: Any other comment

ID EGS9806

Person ID 1263842

Full Name	Karen Roberts
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I attended the exhibition in Berkhamsted in 2017 and was able to ask questions at the time. However there was no opportunity to formally follow these up or to get answers in writing. More than three years have passed and with the coronavirus lockdown lasting a year, and as a concerned resident of Dacorum, I have noticed enormous activity in house building both at Bearroc Park in Berkhamsted and Roman Park in Tring. I would like to know if these are part of the Local Plan and when was approval for these sites made public? I am not aware of any further information been circulated during the last year and although a short extension has been granted, I would suggest a much longer extension given the aftermath of the coronavirus pandemic. Surely there is time to assess this. Notwithstanding this, please find below my objections:
Included files	
Title	Question: Any other comment
ID	EGS9822
Person ID	1267671
Full Name	Ms Sylvia Morris
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I also feel not enough opportunity has been given to a large section of the community which could not access the IT version of the consultation. As a result of Covid 19, the community could not access the library to have a look at the plans and they were not on show at the civic centre.

Included files	
Title	Question: Any other comment
ID	EGS9832
Person ID	
Full Name	
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein</p>

for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS9834

Person ID 1267718

Full Name LAURA ANTONIA RACTLIFFE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Please also note that the consultation has not been sufficiently advertised. It is only due to some leaflets from local councillors that we were notified. Especially during the Covid pandemic the council has a responsibility to raise awareness or postpone the consultation until after the lockdown has been eased and awareness can be raised more easily.

Included files

Title Question: Any other comment

ID EGS9836

Person ID 1265032

Full Name Thomas Ractliffe

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No	
QUESTION ANY OTHER COMMENT comment	Before I state the reasons for my objections, I have to say that the communication for this consultation has been very poor. If it wasn't for our local Libreal Democrat councillor and a flyer received through my front door about the Bullbourne Cross proposal (which I object to) I would not have known at all. I actually wonder how many other residents are not aware because of the lack of communication. For something this vital to our local area, is there a reason why there was not more communication such as leaflet drops through all letter boxes, a window display in one of the vacant shops in the High Street?
Included files	
Title	Question: Any other comment
ID	EGS9843
Person ID	1267733
Full Name	JULIE COOK
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I think given we are in a pandemic it is unacceptable to have such a important public consultation open - this should wait until the end of lockdown ieveryone in the community has the time and access to be able to consider this plan in detail.
Included files	
Title	Question: Any other comment
ID	EGS9860
Person ID	1267744
Full Name	GARETH BELLAMY
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Q9 Additional</p> <ul style="list-style-type: none"> • I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown, and is being rushed through at a time when many of us are struggling with work issues, planning the return of our children to school, and trying to avoid getting seriously ill. • I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard • Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded. • Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home schooling children as well as dealing with the challenges of CV19 and lockdown • The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation • There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing • The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT • It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown • People expect consultations to involve public meetings where officers can explain what is proposed and answer questions • Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".
Included files	
Title	Question: Any other comment
ID	EGS9869
Person ID	1267754

Full Name	DIANE HOLLIDAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I have only come to hear of the plans very recently although I have lived here for over 30 years and because of the pandemic have not moved far from my home. I have not received any information nor have there been any notices displayed locally. Hence my late and rather short reply.
Included files	
Title	Question: Any other comment
ID	EGS9874
Person ID	1264942
Full Name	Douglas Carr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	In this time of a pandemic trying to push legislation through that does not allow for actual representation is undemocratic. Why this has to be done now I really cannot understand. Without actual physical representation I believe that the council will just rubber stamp this and like the car park addition to Berkhamsted we will see a degradation of the physical space at the behest of commercial requirements. I believe this plan should be delayed until representaiion can be delivered in terms of physical meetings. I look forward to this plan being delayed until we can have real attendance to discuss these plans
Included files	

Title	Question: Any other comment
ID	EGS9890
Person ID	1267759
Full Name	PETER AND TRACY DUDLEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>We are writing to object to the plan for development in Dacorum for the following reasons:</p> <p>The number of houses proposed for development per year until 2038 is based on figures produced in 2014, we understand that this proposes a figure of 1,023 houses being built in the area. These figures are now outdated and we're superceded by ONS figures produced in 2018 which only proposed 355 houses per year built. The government figures given need to be challenged by yourselves on this basis. In addition, the figures derived are not the objectively assessed for our area.</p> <p>Secondly, green belt has been defined as land that can only be developed upon in exceptional circumstances. Despite the statement in the plan, the simple need for extra housing cannot be defined as exceptional.</p> <p>Thirdly, resources cannot support the extra houses currently and there is nothing in the plan that states how this will be resolved. In particular, water extraction is at the maximum it can support without the extra supply that will be needed for these developments.</p> <p>Fourthly, there has been insufficient effort to locate brownfield sites in preference to releasing greenfield sites for development.</p> <p>Fifthly, the proportion of social housing proposed is far too low in comparison with the waiting list of 7,000 awaiting housing. It should be ensured that housing meets the needs of the people looking to be housed locally.</p> <p>We are also concerned that there has been insufficient publicity of the plan to ensure that people know what is happening. It is apparent that a significant number of people did not receive a copy of the plan in the post. We did not receive one and had to request it very late on in the available time for consultation because we were unaware of it.</p> <p>Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law". The same should be done for Dacorum.</p>

Included files	
Title	Question: Any other comment
ID	EGS9894
Person ID	1267762
Full Name	NICHOLA DWIGHT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I would also like to highlight that it is impossible to read the planned development details online via an iphone due to how they have been presented. I was unable to find a pdf document which would have been far more beneficial. I believe this could deter people from objecting.</p> <p>Once I managed to review on my pc I found the document to be verbose and at times bewildering. I was unable to find where to object and as such again I believe that this will deter others from raising an objection.</p> <p>At best I feel that that any decision should be delayed for at least a year until we are in a position to ascertain the after effects of the pandemic.</p> <p>Green belt is called so for a reason and once built upon is lost for good.</p>
Included files	
Title	Question: Any other comment
ID	EGS9904
Person ID	1267770
Full Name	Lisa Toms

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS9946
Person ID	1267786
Full Name	BRYONY GLENN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The dogged determination of the council to continue a public consultation (which has been extremely poorly publicised)during a national lockdown is shameful and undemocratic - the council should be giving opportunities for everybody to take part and be listened too which is simply not possible in a meaningful way when there can be no face to face meetings - a decision of such importance and with the potential to have such a massively detrimental impact on the countryside for perpetuity should absolutely NOT be pushed through in this underhand way which severely limits the

voice and rights of your constituents. Your website is very confusing and difficult to navigate making it even more difficult for your constituents to feed back their views to you.

Please take time to reconsider your proposal to destroy the countryside by reviewing what is actually needed and the most appropriate location for it, and have the decency to engage openly and honestly with your constituents when it is possible to do so rather than hiding behind the very handy excuse of COVID to restrict citizens rights in this way.

For the avoidance of doubt, I OBJECT to these proposals.

Included files

Title Question: Any other comment

ID EGS9985

Person ID 1267847

Full Name CRAIG & ANNA SCARBOROUGH

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS9988

Person ID 1267848

Full Name CALEB PRINGLE

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I object to the way this consultation has been conducted during a national lockdown. - Many people still do not know about it. - People without access to IT are excluded. - People have not been told they can send a handwritten response by post. - There has been inadequate publicity
Included files	
Title	Question: Any other comment
ID	EGS10001
Person ID	1267854
Full Name	MARTINA HALLEGGER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Unfortunately at Wednesday night's Dacorum council meeting the motion to extend the Local Plan consultation period to take account of the ongoing Covid restrictions was rejected, seemingly along party lines for: 20, against: 27. The council is seeking to railroad this developer's charter through. The appalling lack of an evidential base and forward planning to account for even the basic elements of public infrastructure means the council needs the public's help more than ever. It needs to formulate a creditable plan and do some proper consultation and research.

The 'winner takes all' approach has got to stop, and a collaborative approach is desperately needed for the good of the region.

Included files

Title Question: Any other comment

ID EGS10004

Person ID 1267856

Full Name HOLLY GREENAWAY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I don't believe the consultation has been fair, as numerous residents have not received the information packs that some households have received. I do not receive free local papers, and during the lockdown have not been out to see any information that may have been available (ie library). I know this information has been published on Facebook, but strongly feel something of this importance should have been more widely distributed, after all, note everyone has access to the Internet and with home-schooling, lots of tools/time has been taken up. Therefore I believe that consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS10011

Person ID 1267858

Full Name KATE & PHIL BAILEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	In conclusion we call upon Dacorum Borough Council to stop the local plan and re-visit it bearing in mind the recent housing densities already achieved and using up to date housing target estimates and protect existing precious greenfield green belt.
Included files	
Title	Question: Any other comment
ID	EGS10027
Person ID	1267862
Full Name	ALEX CHAPLIN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Q9 Additional</p> <p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard</p> <p>— Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home schooling children as well a dealing with the challenges of CV19 and lockdown</p>

— The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation

— There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing

— The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT

— It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown

— People expect consultations to involve public meetings where officers can explain what is proposed and answer questions

— Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

Included files

Title Question: Any other comment

ID EGS10032

Person ID

Full Name

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

7) Pandemic

Things will change after the Pandemic so i think everything should be put on hold until 2023 when things will get back to a bit more normality so we can then assess what changes need to be made

8) Goverment

Goverment has changed its policy on Building new houses why have Dacorum not changed its Strategy

Included files

Title Question: Any other comment

ID EGS10042

Person ID 1267889

Full Name Ms Alison Brathwaite

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS10061

Person ID 489014

Full Name Mrs Carole Lewis

Organisation Details

Agent ID

Agent Full Name

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I was deeply disappointed that the recent council meeting which I observed did not see fit to extend the deadline of tomorrow for responses to the proposed Dacorum local plan. The complexity of it, the incredible effort needed to get to grips with it online together with all the pressures of the pandemic have made it very difficult to respond. Evidence suggests that only a few percent of people have accessed the consultation;lockdown has meant that those without easy access to technology have been excluded. On top of this, advertising has been patchy.However,I have tried my very hardest and this is my carefully considered response.
Included files	
Title	Question: Any other comment
ID	EGS10069
Person ID	399466
Full Name	Mrs Karin Nield
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I also believe that this consultation is floored as with lockdown the ability to hold public meetings and debate has been lost, as such the process should be delayed until such point that the population can be properly engaged.
Included files	
Title	Question: Any other comment
ID	EGS10071
Person ID	1267996
Full Name	Mr Christopher Vile
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	On the wider scope, I feel the consultation should be delayed. Here I'm considering that everyone has been distracted by the pandemic and unable to communicate with the other local residents in a normal way during the multiple lockdowns so far since early 2020. We simply have not had our minds on anything but the pandemic and helping the local community through it.
Included files	
Title	Question: Any other comment
ID	EGS10092
Person ID	1268034
Full Name	MR IAN GUNTER-JONES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate</p>

provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty.

Included files

Title Question: Any other comment

ID EGS10110

Person ID 1268045

Full Name C PERRY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure

associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. This should include the Area of Natural Beauty as seen from all sides of Tring. To include the aspects from Wigginton and Tring Park as well as from Ashridge and Ivinghoe Beacon.

Included files

Title Question: Any other comment

ID EGS10128

Person ID 1146091

Full Name Mr John Foster

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation — There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law". There is a lack of information in relation to the schools proposed in Northchurch - the impact and plans around this are not clear

Included files

Title	Question: Any other comment
ID	EGS10145
Person ID	1268068
Full Name	MICHAEL MATFIN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	also think that the manner of the consultation, relying as it does on the ability of people to access the internet is wrong. It will deny a voice to many people who may also object if they were able.
Included files	

Title	Question: Any other comment
ID	EGS10167
Person ID	1268076
Full Name	Paula Feighery
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after

all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.

Included files

Title Question: Any other comment

ID EGS10174

Person ID 1259999

Full Name Paul Peters

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I write to express my concerns regarding Dacorum Borough Council's local housing plan. I send this email having attempted without success to navigate the extremely complicated and difficult to follow planning website. As somebody who considers themselves technology literate, the lack of ease of finding information in layman's terms about the plan and the impossible to navigate plan website which I could not fathom how to respond to, highlights the issue of marching forward such a huge life and area changing plan during a pandemic. When meetings and consultations are impossible face to face, for many less technology savvy members of our community, this stops people being able to understand or even have any awareness of the plans at all and those people have had their say taken away from them by the council's decision to proceed with the consultation deadline. Based on the information I have been able to access I have huge concerns about the general way in which the plans have been decided upon.

Included files

Title Question: Any other comment

ID EGS10190

Person ID 1268090

Full Name Jean Jenner

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I would like to object firstly that the consultation process is inadequate and worthless as I can't read all of those documents online and don't think this is a fair process. Many people still don't even know about the plan.
Included files	
Title	Question: Any other comment
ID	EGS10193
Person ID	1268090
Full Name	Jean Jenner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The council needs to put the mental health and needs of the citizens first and hold an effective and informed and accessible consultation. There should be checks put on the influence of developers, all contacts they have with councilor council members, at all levels, should be recorded and made public. Building expensive housing on green belt to fund less attractive, or poky social housing is not acceptable.</p> <p>The plan needs better consultation and needs to prioritise green spaces being protected and enhanced, and housing provided according to local need only, and not funded by selling off land to developers.</p>
Included files	
Title	Question: Any other comment
ID	EGS10195

Person ID	1268096
Full Name	TRACEY DAVIES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I feel that this consultation should be stopped as like many of the Northchurch residents we have been inadequately informed of such a substantial and obscene housing development taking place.</p> <p>I feel I really must appose such plans and the consultation as we were inadequately informed. Neither myself nor my neighbours have received any notification on these plans and how are the general public with no internet access supposed to find out about these proposals in their own local area? Absolutely disgraceful!</p>
Included files	
Title	Question: Any other comment
ID	EGS10196
Person ID	1059789
Full Name	Mrs Alison Somek
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>My main recommendation is that this plan is put on hold, while there is a re- appraisal of housing numbers (which I believe to be lower than detailed in the Local Plan) and with a focus on maintaining and enhancing the identities and communities that we have. I believe this is totally justifiable as a direct result of the pandemic.</p>
Included files	

Title	Question: Any other comment
ID	EGS10204
Person ID	1059789
Full Name	Mrs Alison Somek
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I appreciate that amount of work and thought that has gone into developing this proposed Local Plan. However, my overriding view is that there should be a stay on confirming the plan, specifically on account of the pandemic and the undoubted impact that this will have on lives and life styles.
Included files	

Title	Question: Any other comment
ID	EGS10210
Person ID	1268108
Full Name	PAUL YARKER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	The deadline to respond is unfair given the current climate and lack of opportunity to ask questions during consultation.

Included files	
Title	Question: Any other comment
ID	EGS10215
Person ID	1268163
Full Name	RONA GIBSON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>I am writing to you to make some points regards the Dacorum Local Plan 2020 to 2038</p> <ol style="list-style-type: none"> 1 I know that the deadline has already been extended for the consultation. However I feel in the current circumstances when the population is in the midst of a third lockdown that not everyone's thoughts have been able to focus on this Dacorum Local Plan. Hence I would like to propose that the deadline is extended again. 1 Some of my concerns 1 a) From 23.120 " There are few opportunities for new road capacity in the town. The careful location of new development and promoting opportunities for sustainable travel, will in part help tackle a number of parking and traffic issues. " <p>The main artery from the A41 in to Berkhamsted - Kings Road A416 - is a narrow road and is already extremely busy during peak times and this will become more congested. Shootersway will be affected greatly by the increase in traffic as a result of the large development in the area.</p> <ol style="list-style-type: none"> 1 b) Please can you detail if there are now any further proposals for waste management ... "The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to

the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required.” From Draft Infrastructure Delivery Plan Appendix B - Berkhamsted Schedule.

- 1 c) This is near an Area of Outstanding Beauty and I do wish reassurance or some explanation that this will continue to be so for future generations to enjoy and relax in.

The increase in population could have an enormous effect on the Ashridge Estate.

Included files

Title Question: Any other comment

ID EGS10263

Person ID 1153993

Full Name Eric Martin

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment It is clear that the Council is in a very difficult position as it attempts to generate this Plan. My view is that it should not proceed in its current form and on its current timetable, because

1. The public consultation has taken place during a period of covid lockdown, and a significant number of residents, who are unable to use computers, have been unable to travel to view the documents, and have effectively been disenfranchised. Public consultation should not be completed until after travel restrictions are lifted.
2. The Plan refers to the South West Herts Joint Strategic Plan. It is encouraging that these Councils are intending to work together to provide programmes which will serve the residents of this area as a whole. I suggest that the Dacorum Local Plan, which extends to 2038, should be configured to align with this Joint Strategic Plan, which is scheduled to be available in late 2023.

Included files

Title	Question: Any other comment
ID	EGS10269
Person ID	1151968
Full Name	MR DAVID BROWN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Unfortunately, I have been unable to complete the response form as set out on the Dacorum website. I am unable to complete the forms as it does not function properly. But, I do wish to register my comments and views. Therefore, please accept the email below as my comment on the Draft Local Plan. Thank you.
Included files	
Title	Question: Any other comment
ID	EGS10284
Person ID	399324
Full Name	Ms Julie Hollway
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Input as requested during the Consultation to the proposed Dacorum Local Plan. (I use email as the Portal is way too cumbersome for people to use!)

Why on earth are DBC and the government pushing through this consultation when we are in a time of such huge change. Brownfield sites have become available which could be used for housing and there seems a pressure to speed through an incorrect process with **INCORRECT NUMBERS OF NEEDED HOUSING** in the borough.

By contrast, in October 2020, Buckinghamshire Council withdrew the Chiltern and South Bucks local plan in part due to Covid-19, noting that a revised plan would be drawn up to "*reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law*".

(<https://buckinghamshire.moderngov.co.uk/ieListDocuments.aspx?CId=336&MId=16533&Ver=4>, agenda item 7). DBC's decision to push ahead with a draft plan in circumstances where, as the government has stated "*the way that the country lives, works and travels continues to change more rapidly than at any time since the war*", appears misguided, both from the perspective of ensuring that a proper consultation takes place, and from the perspective of the need to address the changes wrought on residents' way of life, and consequentially our planning needs, by the pandemic. ('*Government response to the local housing need proposals in "Changes to the current planning system"*', December 2020 (announcing decisions following planning consultation launched in August 2020) (Government December 2020 housing need consultation outcome)

<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system-to-respond-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>)
As the government notes, "*This has implications, for example, on demand for commercial and retail floorspace in our cities and urban areas. We want our towns and cities to emerge from the pandemic renewed and strengthened – more beautiful, more healthy, more environmentally sustainable and more neighbourly places, with greater public and private investment in urban housing and regeneration*". (Government December 2020 housing need consultation outcome.)

Included files

Title Question: Any other comment

ID EGS10297

Person ID 1268252

Full Name MATTHEW MOJSAK

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Also may I say that trying to give residents a deadline for this whilst a lot of people are home schooling and under pressure is not right and demonstrates a lack of thought in allowing the residents adequate time to compose a response to this.

Included files	
Title	Question: Any other comment
ID	EGS10300
Person ID	1268255
Full Name	ALISON BURDEKIN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I believe that the consultation should have been extended to when lockdown is over, and the decision not to do so shows the complete lack of consideration towards local residents.
Included files	
Title	Question: Any other comment
ID	EGS10316
Person ID	1268339
Full Name	Mr Adam Craig
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Q9 Additional

— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown

— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard

— Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.

— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home-schooling children as well as dealing with the challenges of CV19 and lockdown

— The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation

— There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing

— The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT

— It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown

— People expect consultations to involve public meetings where officers can explain what is proposed and answer questions

— Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

Included files

Title Question: Any other comment

ID EGS10325

Person ID 1268350

Full Name Mrs Tamsyn Craig

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Q9 Additional</p> <p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard</p> <p>— Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home-schooling children as well a dealing with the challenges of CV19 and lockdown</p> <p>— The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation</p> <p>— There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing</p> <p>— The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT</p> <p>— It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown</p> <p>— People expect consultations to involve public meetings where officers can explain what is proposed and answer questions</p> <p>— Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".</p>
Included files	

Title	Question: Any other comment
ID	EGS10332
Person ID	1268365
Full Name	Ms Joan Errington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Having check out your website and found it wanting, it keeps dropping out making it difficult to follow but I persevered and read it all.
Included files	

Title	Question: Any other comment
ID	EGS10337
Person ID	1268406
Full Name	IAN CHEESE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	1 The lack of publicity that you have given your Plan and the corresponding lack of opportunity given for response by the community suggests you feared the reaction it might cause – and with good reason. For Councillors who are elected by the community to produce a Plan that fundamentally damages that community and its environment is, to say the least, unacceptable.

Included files	
Title	Question: Any other comment
ID	EGS10348
Person ID	1268418
Full Name	JOSEPHINE O'NEILL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am very concerned that amongst the wider Dacorum community there is a general lack of knowledge about the local plan and more importantly that the consultation period for it is about to close and as such people have missed the chance to comment on their future. I was under the impression that an awareness campaign was due to be in place but as a resident, I have received or seen nothing highlighting the consultation.</p> <p>Due to Covid restrictions it has not be possible to engage and inform people with events such as:</p> <ul style="list-style-type: none"> • Door to Door canvassing of the local plan consultation • Interested parties to meet and canvas at the various town markets <p>Covid restrictions have impacted</p> <ul style="list-style-type: none"> • Our ability to attend Council Meetings in person rather relying on access to online forums • Residents being able to meet and consider responses to the local plan <p>The Government has asked all of us to restrict our interactions with the general public as it is both irresponsible and unlawful to do otherwise.</p> <p>The council should extend this consultation by many more months, until the current crisis is over and an additional subsequent period be provide for the full engagement by all Dacorum residents.</p>

I feel the strategy has failed to take account of a number of important issues or has diminished their significance, most importantly - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs. The pursuit of economic growth should be balanced against and not override environmental concerns and climate obligations.

Included files

Title Question: Any other comment

ID EGS10351

Person ID 1268422

Full Name CAROLYN PANKIW

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

With reference to the above consultation. I have not been able to get on to any of the links given to view the consultation, however, I would like to register my objections to the plans for approx. 3000 houses to be built between Long Marston, Wingrave and Cheddington. The plan is totally inappropriate for the whole area. There is limited access to the site as all roads come through three small villages and other infrastructure is non-existent. There is an ongoing problem with flooding in Long Marston, as well as many of the fields around here.

I do not understand how plans can be made when the land is owned by several different private owners and it is definitely not a major infrastructure project!!!!!!

I do not live in Hertfordshire but on the edge (in Buckinghamshire) of the proposed project. Why is it that the consultation has been given such a limited time when the vast majority of the local population were not even made aware of them, especially those in Buckinghamshire who would be severely impacted by the plans. You cannot view the plans in the local library – these have been shut for many months, and as stated previously the links given to view the plans are unattainable.

I am in disbelief that an area such as this could even be considered for such large scale building,

I look forward to receiving your comments although, being slightly sceptical, I would doubt that I will even get an acknowledgement.

Included files**Title** Question: Any other comment**ID** EGS10365**Person ID** 1268428**Full Name** CLARE SIDEBOTTOM**Organisation Details****Agent ID****Agent Full Name****Agent Organisation****Yes / No**

* Yes

* No

QUESTION ANY OTHER COMMENT comment This is a complaint as to how you have managed the consultation process for the local plan for Dacorum emerging strategy development. We are in Lockdown, we are home-schooling, juggling jobs and worried about job security. This is not the time to be pushing this through. We haven't even received literature about it! Shocking.**Included files****Title** Question: Any other comment**ID** EGS10380**Person ID** 1267063**Full Name** ANN CONROY**Organisation Details****Agent ID****Agent Full Name****Agent Organisation**

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS10381
Person ID	1268431
Full Name	MARY CRABB
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I have tried in vain to register my objection to the above proposal via your website which is so complicated that I have had resort to this email. I trust that my objection will be included in the petition and request confirmation of the same.
Included files	
Title	Question: Any other comment
ID	EGS10413
Person ID	493957
Full Name	Mrs Anne Galewski
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Whilst we are in the midst of a pandemic and in lockdown I do not believe this consultation should be taking place at all. We cannot view the plans etc at libraries or council offices, so we are dependent on electronic means. This disenfranchises residents who do not have access to the internet, email etc and therefore I think it is unlawful and if not at best unfair. It should have been postponed, and it shows the arrogance of councillors who failed to stop the process in council meetings when the issue was discussed and that opportunity was open to them.
Included files	
Title	Question: Any other comment
ID	EGS10420
Person ID	494926
Full Name	Mr John Pepper
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The consultation process is not a process. It is appalling. The timing of which has been accelerated during a global pandemic for the only purpose of sweeping it under the radar. Had it not been for local campaigns / flyers etc 99% of Tring residents would not have known the consultation was running at all. Without face to face consultation you have alienated vast swathes of elderly and those that do not have the latest and greatest technology.</p> <p>Then add the impossible portal to navigate and unless you have a bachelors in IT, you are not going to be "consulted" at all. How incredibly poor and detrimental to democracy. Unfair and unfit.</p>
Included files	

Title	Question: Any other comment
ID	EGS10430
Person ID	334456
Full Name	Mr Martin Cotton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	This document is long, at times impenetrable, and has plainly taken a large team of people a great deal of (paid) time to research and compile. It is, therefore, not reasonable to expect any individual to read and understand the minutiae of the Plan in the time available (if at all). My comments will, accordingly, be confined to certain areas.
Included files	
Title	Question: Any other comment
ID	EGS10478
Person ID	1268453
Full Name	ROSEMARY ROUSE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	The whole process should be halted until the plans can be seen properly in public and a face-to-face discussion with our councillors held. The residents of Dacurum deserve nothing less than this. The whole plan needs to go back to the drawing board and be reassessed.

Included files	
Title	Question: Any other comment
ID	EGS10480
Person ID	1268450
Full Name	JOSEPH STOPPS
Organisation Details	DACORUM GREEN PARTY
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	We believe a much simpler public consultation should be implemented. The current consultation is not fit for purpose. Asking members of the public to comment on a huge document and answer specific questions about the NPPF is not a user friendly consultation. We have been approached by numerous members of the public who have not responded to the consultation due to its incredible complexity. Dacorum Green Party believe this consultation is fundamentally flawed.
Included files	
Title	Question: Any other comment
ID	EGS10483
Person ID	1268456
Full Name	Simon and Elisabeth Davies
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS10485
Person ID	1268457
Full Name	Samantha Cooper
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS10487
Person ID	1268460
Full Name	Nicola Nash
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS10504
Person ID	869129
Full Name	Ms Ann Hetherington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS10507

Person ID 1268608

Full Name ANDREW CLARKE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment I tried to leave comments on your web portal but was unable to do so. The system continually returned an error 500.

Included files

Title Question: Any other comment

ID	EGS10510
Person ID	1264641
Full Name	Chris Mack
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I wish to object to Dacorum's Local Plan, both from a procedural point of view and also regarding the content.</p> <p>Firstly regarding the procedure and notification. There needs to be proper and effective consultation, not something that appears to have been ushered in through the back door during a pandemic. The consultation period should be extended and remain in force until well after the pandemic has ended.</p> <p>1) This consultation was not well advertised. It has taken place during three months of lockdown during a pandemic and many members of the community are unaware, despite the seismic changes these proposals would make to the borough. I myself only heard about it through the latest edition of the Parish magazine.</p> <p>2) There needs to be proper consultation, which means public meetings with proper and effective explanation of what is proposed.</p> <p>3) The online system is extremely confusing and not sufficient. I have a degree in engineering and am computer literate but found it very hard to comprehend what the proposals are and exactly where they are taking place. The online system is even more unfair to older members of the community and those who are less computer literate.</p> <p>4) The mapping in the proposals is appalling. Truly woeful. The maps, both in the proposal document and in the virtual presentation, are very small scale with extremely poor detailing and minimal labelling. I give two example below.</p> <p>local_plan_emerging_strategy_for_growth_2020_2038_draft_proposals_map.pdf</p> <p>https://dacorumlocalplan.consultation.ai/#board-10</p> <p>I live in the area and cannot understand from these maps the precise locations of the proposals, or even where my house is!</p> <p>In the map on this link below you haven't even spelt the name of my village, Gaddesden Row, correctly. If you can't even get that right, I have no confidence in your plan to build 16,600 homes in the borough.</p> <p>https://dacorumlocalplan.consultation.ai/#board-16</p>

5) It is unclear in the online system how to raise 'big picture' concerns rather than replying to each individual point in a document running to hundreds of pages.

I was interested to hear other people's thoughts so clicked on 'what people say' but the links don't work.

Included files

Title Question: Any other comment

ID EGS10516

Person ID 334492

Full Name Mrs Sacha Hughes

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Lastly, I would like to make my concerns about the fact that the consultation has not been made visible to all residents, and it is inconceivable that such an important document has not been posted out to all residents, but instead awareness has been raised via social media etc.

My elderly mother who is also resident in Northchurch is NOT on social media and is partially sighted and has been shielding throughout the Covid pandemic. She has not received any postal notification about the draft plan – how are the elderly and those without internet access supposed to respond if they have not been made aware of the draft plan in the first place?

We are custodians of the future and it is unjustifiable to lose so much of our green space in order to adhere to an outdated policy which does not stand up to scrutiny.

Included files

Title Question: Any other comment

ID EGS10564

Person ID 1268702

Full Name Kirstin Chaplin

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Q9 Additional</p> <p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard</p> <p>— Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home schooling children as well as dealing with the challenges of CV19 and lockdown</p> <p>— The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation</p> <p>— There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing</p> <p>— The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT</p> <p>— It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown</p> <p>— People expect consultations to involve public meetings where officers can explain what is proposed and answer questions</p> <p>— Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, <i>"reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law"</i>.</p>
Included files	
Title	Question: Any other comment
ID	EGS10577
Person ID	1164729

Full Name	David Clarke
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS10578

Person ID	1263426
Full Name	Marilyn Whyman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I am sending you this email with my objection on as I am unsure if I have completed my objections in the correct place. I did not want my response not to be taken into account. Also I was unable to submit a photo I had regarding flooding
Included files	new houses cause floding.pdf
Title	Question: Any other comment
ID	EGS10596
Person ID	1268725
Full Name	CHARLOTTE SMITH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Please note there was no brochure delivered to our address, this document is called Steve's draft plan and you cannot save it and go back to it so it is another barrier to the consultation process.
Included files	
Title	Question: Any other comment
ID	EGS10636

Person ID	1268732
Full Name	KATRINA BECKWITH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>y position has been presented. To reiterate, it is concluded that the Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is not for me to determine the appropriate housing need requirement, however it is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p>
Included files	
Title	Question: Any other comment
ID	EGS10637
Person ID	1268733
Full Name	Mrs Nicola Pepper
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	The consultation process has been biased (excluding swathes of Dacorum residents due to its poor inaccessibility) and poorly run. I am frankly appalled that this is continuing.
Included files	
Title	Question: Any other comment
ID	EGS10657
Person ID	1268740
Full Name	SUSAN SOMMERVILLE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	My household (ADDRESS REMOVED) never received the consultation leaflet.
Included files	
Title	Question: Any other comment
ID	EGS10677
Person ID	1268742
Full Name	Ross Dorras
Organisation Details	Group Scout Leader 1st Bovingdon Scout Group
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	I feel many more off the over sixty families involved in Beavers, Cubs and Scouts in Bovingdon would have responded had the planning portal not been so difficult to navigate through and use.
Included files	
Title	Question: Any other comment
ID	EGS10711
Person ID	1268746
Full Name	DANIEL GARROD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>This consultation should not be being pushed through during a national lockdown.</p> <p>This consultation seems to be taking advantage of COVID disruption to push through highly controversial local developments. The consultation has been extremely poorly advertised and the inability to leave one's house makes any kind of organised objection far more difficult. The council seems to be taking advantage of the lockdown nature of local residents and at the very least should delay this consultation until all lockdown restrictions have been eased to ensure appropriate evaluation.</p>
Included files	
Title	Question: Any other comment
ID	EGS10714
Person ID	1161079
Full Name	Melanie Llewellyn
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I support everything said by the One Voice Alliance.</p> <p>I consider that there should be a moratorium on any further significant in housebuilding until the Borough has a healthcare system that is at least on a par with the national average and can then accommodate an increase in the population, and until there is a proper sustainable water and sewerage infrastructure that does not involve the desiccation of the local chalk streams and a cessation of our water supply in the summer months.</p> <p>Lack of Proper Consultation To begin with I want to protest at the way this consultation has been conducted. My household has not received ANY communication from the Council about this Plan. No doubt because of the pandemic, there has been no public display or model showing housing or traffic movements consequent to the Plan. Despite a woeful lack of public engagement, the Council has pressed ahead with a process in a way which could be construed as avoiding public scrutiny. It is Putinesque and would probably be wide open to legal challenge.</p>
Included files	
Title	Question: Any other comment
ID	EGS10758
Person ID	1268754
Full Name	Mrs Rebecca Lumsdon
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

**QUESTION ANY OTHER
COMMENT comment**

As a chalk river, the River Bulbourne is of international significance and it falls into the category of a priority habitat under the Natural Environment & Rural Communities Act 2006 (S41). Many species living in it and along the banks rely on a sustained flow of water which is normal in a natural chalk stream fed partly by underground springs like the Bulbourne. A recent case study by 1S. Wilson provides evidence that the Rivers Bulbourne and Gade no longer behave as chalk streams should. He demonstrates that rapid rise and fall in the water levels are more typical of urban run-off than chalk streams and he observed flooding. Surface water running off hard-standing (roads, paths, rooftops, etc) is rapidly directed via drains into these rivers during periods of medium and high rainfall causing the water levels to quickly rise and fall. What should be clear water often becomes cloudy due to silt, rubbish and pollutants. Progressive silting and growth of vegetation in the water channels reduce the flow of water and increase the risk of flooding. - Will buildings and roads increase the probability of damage to the river ecosystem and some homes being flooded? As these rivers are of global significance, should the Local Plan incorporate measures to restore and protect them? Dacorum Borough Council have a duty to have due regard to the conservation of biodiversity under the Natural Environment and Rural Communities Act 2006 (S40). Those habitats and species which are of principal importance for the conservation of biodiversity in England are listed in Section 41 and include the House Sparrow, Cinnabar Moth and Great Crested Newt. s biodiversity likely to be increased, or diminished at the proposed development sites? What specific biodiversity, green infrastructure or compensating measures do you think should be recognised in the various site plans? Are Local Authority measures in place to ensure that developers adhere to a development plan after Planning Permission is granted and before any long-term biodiversity damage occurs?

I am concerned at the loss of hedgerows and trees - all impacted if these wetlands were built upon. We had our planning permission staunchly objected by the conservationists - and we accordingly built a smaller extension and used natural wood as the house's outer covering. How can you justify therefore building hundreds of houses in the same patch of land? Bank Mill Lane has only a handful of cottages - several listed buildings - and already there are traffic issues with cars overflowing from the Old Mill pub. There have been several near collisions on a road that is only wide enough for one car to drive down - and really should be one way. How will this road and indeed the bridge to Bank Mill sustain more cars and people? I can safely predict there would be deaths if this were to be the case.

Investment funds are being allocated to Hemel Hempstead for transport and amenity requirements associated with expansion of the town. Equivalent financial and infrastructure support is not being given to Berkhamsted and Tring.

I think the number of proposed developments across Dacorum is excessive and question the formula used to calculate it...

I am also concerned about families with sick children or elderly and disabled people trying to get to the Gossom's Road surgery where there is already inadequate parking? Trying to see a doctor prior to the pandemic was a near impossibility - how will the town cope with a huge influx of people, when there are already many elderly people living here who will need access to their local GP? Are we to simply never get to see a doctor as there will not be enough GPs to care for that many people...

I am deeply concerned about the strong Countryside / Green Belt boundary Impact on valley sides and important dry valley location.

Also I am worried about the encroachment of the urban area along the valley bottom and adjoining open countryside. Also the distance to town centre services and facilities, employment, land and station. Finally as I have already stated, the impact on setting of the River Bulbourne Reduction in the degree of separation between the town and Bourne End.

Included files

Title Question: Any other comment

ID EGS10764

Person ID 1268755

Full Name Mrs Lesley Reynolds

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment It appears that Dacorum Borough Council have tried to get this local plan passed in a very underhand way. Racing ahead in a time of National Lockdown when residents are unable to get together to see plans and review proposals. Everything is hidden away on difficult to understand websites when not everyone has access to the internet. Not challenging the number of houses set out by Government guidelines, nor changing them when the guidelines changed. Northchurch is not an urban area. It is not West Berkhamsted. The proposed sites are on Greenbelt areas of fields and hedgerows with lanes not thoroughfares. An area of outstanding natural beauty which would be permanently destroyed.

Included files

Title Question: Any other comment

ID EGS10774

Person ID 1268759

Full Name Mrs Catherine Rudin

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not adequate. The plan requires substantial additional assessment to supplement the reconsideration of the evidence available; there should be more detailed assessment of housing supply requirements and the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a duty to cooperate. A substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>There should be a reversion back to a strategy where Hemel Hempstead takes on the vast majority of housing need, given the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS10787
Person ID	1268762
Full Name	Mrs Natalie Hill
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS10797
Person ID	1268763
Full Name	Mr Michael Hill
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS10800
Person ID	1268767
Full Name	Erica Spanswick
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	
* Yes	

* No	
QUESTION ANY OTHER COMMENT comment	<p>My first point is about the process itself. The decision to run a public consultation during a pandemic and over the holiday period was questionable. As people would be home and in lockdown, neither out and about nor interacting with each other, the customary channels for engaging the public were severely diminished. This would include word of mouth, exhibitions and information events at community centres, the free local papers that people would pick up while out, any local groups flyering householders to lobby them to respond (as this is not allowed). All of these casual ways of raising awareness would not be available at this time of national lockdown in what was a tier 4 area for much of the relevant period. However, having decided nevertheless to go ahead despite these issues, the council should have recognised the importance of getting the information to each and every household. It is therefore all the more surprising that the council only decided as an afterthought to distribute an information leaflet to every household.</p> <p>Along with most of the people in Potten End village, I did not receive that information leaflet. An online poll of the village suggested 81% didn't receive it. Nor did I receive the October 2020 "Dacorum Digest" magazine that had some information about the local plan within it (although notably this was from before the consultation even started). These gaps were never remedied, as very few people would have known to ask for that which they did not know they ought to have received.</p> <p>I believe this has left many parts of the Dacorum population in ignorance of this process, and that the Council has failed in its duty to ensure robust engagement to such an important plan.</p>
Included files	
Title	Question: Any other comment
ID	EGS10882
Person ID	1149755
Full Name	MR CHRIS PICHON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>This consultation process is deeply flawed and will not secure the required feedback from residents. There are many, many people who are not computer literate to be able to respond on-line. There were more than 50% respondents to our Parish Survey which were hard copy, with people preferring to respond with hard copy responses rather than complete the survey on-line.</p> <p>For our Neighbourhood Plan consultation and survey we had a separate questionnaire for young people to feed in to. Where are the feed back from young people with this consultation process? There is none at all and yet many of these young people will be totally affected by this Local Plan. Why haven't DBC sought their views?</p>
Included files	
Title	Question: Any other comment
ID	EGS10889
Person ID	1268804
Full Name	Mr Mark Dixon
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>I am very concerned that amongst the wider Dacorum community there is a general lack of knowledge about the local plan and more importantly that the consultation period for it is about to close and as such people have missed the chance to comment on their future.</p> <p>Due to Covid restrictions it has not be possible to engage and inform people with events such as:</p> <ul style="list-style-type: none"> • Door to Door canvassing of the local plan consultation • Interested parties to meet and canvas at the various town markets

Covid restrictions have impacted

- Our ability to attend Council Meetings in person rather relying on access to online forums
- Residents being able to meet and consider responses to the local plan

The Government has asked all of us to restrict our interactions with the general public as it is both irresponsible and unlawful to do otherwise.

The council should extend this consultation by many more months, until the current crisis is over and an additional subsequent period be provide for the full engagement by all Dacorum residents.

I feel the strategy has failed to take account of a number of important issues or has diminished their significance, most importantly - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs. The pursuit of economic growth should

Included files

Title

Question: Any other comment

ID

EGS10916

Person ID

333678

Full Name

Mr David Simons

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I believe that the Draft Local Plan publication date, should be delayed beyond the current lockdown caused by the Covid 19 epidemic. There has not been enough opportunity for large sections of the community that could not access the IT version of the consultation. The community could not access the library, the Forum, or Victoria Hall. The consultation should be regarded as invalid and anti-democratic. I understand other boroughs have delayed their consultations.

Included files

Title	Question: Any other comment
ID	EGS10928
Person ID	1059452
Full Name	Mrs Angela Whitehead
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I find the website and response area difficult to navigate, in fact almost impossible to use, so I am responding directly.
Included files	

Title	Question: Any other comment
ID	EGS10938
Person ID	1268871
Full Name	Ms Karla Hatrick
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I've been trying to recover my password in order to make a comment on the strategic plan, but though the website says it has sent me a link to reset my password, I have still not received a reset email. I cannot print off the pdf consultation document either so have no other way to reply other than a direct email.

May I therefore submit some comments in this email?

We recently heard- last week-of the inclusion of Long Marston as a potential site for 3,000 houses, as part of Dacorum's strategic plan. I realise that it is one of many options, but the fact that it is proposed at all, is extraordinary.

Long Marston's name means Long Marsh, we are a wet, rural area with increasing flood problems, and wet habitat offering unique spaces for rare and protected species e.g. black poplars and greater crested newts. The village flooded several times in the last months. Our roads are too narrow for even 2 cars to pass, in many places. We have a conservation area and listed buildings. Yet of all the places to suggest new houses, we are a potential site? I believe strongly in local democracy, but I wonder then if anyone from Dacorum who has been involved in writing the report has visited the site in question, or spoken to residents, and would perhaps like to do so after wet weather. We certainly, as a village, have had no notification of the potential for building, no discussion, no consultation.

So if you're looking to build houses on a flood plain, to increase flooding for others in the village, and to build houses which will become uninsurable when they too flood, on small narrow roads with potholes far from any major road network, where community cohesion will be ripped apart as all locals who know of the plans object, where rare local species will be negatively affected, green sites destroyed, conservation areas made pointless, then what a great choice. This kind of proposal is precisely what makes people lose faith in the competence of local decision making.

Included files

Title Question: Any other comment

ID EGS10949

Person ID 1268880

Full Name Ms Jo-anne Tunmer

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

<p>QUESTION ANY OTHER COMMENT comment</p>	<p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard</p> <p>— Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home schooling children as well a dealing with the challenges of CV19 and lockdown</p> <p>— The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation</p> <p>— There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing</p> <p>— The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT</p> <p>— It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown</p> <p>— People expect consultations to involve public meetings where officers can explain what is proposed and answer questions</p> <p>— Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, <i>"reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law"</i>.</p>
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Included files	
Title	Question: Any other comment
ID	EGS10980
Person ID	1268903
Full Name	ANGELA NODDER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
<p>Yes / No</p> <p>* Yes</p> <p>* No</p>	Yes

QUESTION ANY OTHER COMMENT comment	The restrictions around the Covid pandemic have not allowed adequate public debate and scrutiny of the proposals.
Included files	
Title	Question: Any other comment
ID	EGS10981
Person ID	1262818
Full Name	MRS SUE COLLYER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I wish to record that I consider the online requirements to submit objections to be an enormous hurdle to people who wish to record their opinions. I did submit an online form some weeks ago, and have only now realised I never received an acknowledgement - so did you get it or not??</p> <p>So, I resolved to complete another one, couldn't remember my password - and despite your system saying it had sent me a reset password, to date I have not received one.</p> <p>Then being required to complete, scan, print and send a complicated form nearly led me to abandoning this - but I feel strongly about it so I have persevered.</p>
Included files	
Title	Question: Any other comment
ID	EGS10992
Person ID	1162376
Full Name	Jade Holmes
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS11008
Person ID	1263256
Full Name	Anthony Blumsom

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Please create a plan that respects the NPPF, the green belt, the environment and the number of dwellings actually required.
Included files	
Title	Question: Any other comment
ID	EGS11015
Person ID	333882
Full Name	Mr Mark Barfield
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure</p>

associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty.

Included files

Title Question: Any other comment

ID EGS11030

Person ID 1268910

Full Name SIMON LAWSON

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* **Yes**
* **No**

QUESTION ANY OTHER COMMENT comment Two other events since 2014 may also materially affect projections of required development: Brexit and the Covid 19 pandemic. How far are you updating your forecasts to allow for the economic impact of these developments? Together with changes in the retail sector (from in person to online shopping), there may be less demand for commercial and industrial space. In turn, this may free up more Brown Field space than could have been envisaged when the Plan was compiled.

Included files

Title Question: Any other comment

ID EGS11052

Person ID 1145445

Full Name	Mr Jason McInerney
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS11067

Person ID	1268913
Full Name	SONIA FAIRBARN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>ENVIRONMENTAL IMPACTS</p> <p>Adverse impacts are currently already occurring on the Beechwood SAC, SSSI's and all our local honey pot sites as a result of human recreational uses. In the wider Tring area the existing network of footpaths, bridleways and byways are currently being adversely impacted by current levels of use by walkers, cyclists, runners and horse riders. This deterioration is evident in the visible impacts on the surfaces of the various trackways. Parking vehicles on road verges and under trees is causing soil disturbance and ground compaction leading to loss of vegetation, shortening tree life and loss of biodiversity. Current measures do not exist to rectify these impacts. Additional adverse impacts will occur at a greater rate as a result of increased use due to development growth in the north-west corner of Dacorum, leading to increased impacts on the features of environmental importance. Inappropriate development by local authorities (e.g. building in non-sustainable locations such as floodplains) do not result in sustainable development. They provide problems for the future. Large increases in growth for Tring will result in further deterioration of the local environment. Environmental NGO's such as The National Trust, The Wildlife Trusts, The Woodland Trust, etc are left with managing increased human pressure on their sites, attempting to minimise the impacts but not able to sustain the long term biodiversity interest.</p> <p>Existing valuable habitats within all proposed sites must be retained and safeguarded. Primarily these are mature trees and ALL hedgerows within the sites and along the boundaries.</p> <p>Safeguarding requires that British Standards must be applied where they exist. B.S. 5837: 2012 Trees in relation to construction must be strictly applied to protect both trees and hedgerows (e.g. erect metal protective fencing, avoid soil and root compaction). Prior to on-site development the existing interest should be managed sympathetically and not allowed to diminish in order to facilitate ease of development. Increasingly biodiversity interest is compromised by developers prior to site assessment. Preliminary biodiversity assessment by the local authority or an independent ecological consultancy is therefore required so as to evaluate the true cost of developing a site. This assessment should include assessment of carbon, nitrogen, nutrient and other relevant impacts</p>
Included files	

Title	Question: Any other comment
ID	EGS11079
Person ID	333832
Full Name	Mr Robert May
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I found the process for commenting on these proposals complicated and confusing. Many residents must have been put off responding as they would wish.</p> <p>We only received a copy of the Local Plan on 3 February. Far too short a notice to develop a properly researched response.</p>
Included files	
Title	Question: Any other comment
ID	EGS11083
Person ID	1162859
Full Name	Lesley Brown
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	

QUESTION ANY OTHER COMMENT comment	<p>Sadly I have been unable to complete the response form as set out on the Dacorum website as it does not seem to be easily usable. I do however wish to register my comments and views. Therefore, please accept the email below as my comment on the Draft Local Plan. Thank you.</p> <p>Firstly I would like to say that I do not think the whole general public of Dacorum have been given ample opportunity to see or comment on the proposals unless they have access to electronic means and are thus disadvantaged and not able to participate all of which has been exacerbated because of the pandemic. I would therefore propose that an extension should be given to the response time.</p>
Included files	
Title	Question: Any other comment
ID	EGS11089
Person ID	1262172
Full Name	Janice Boakes
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The plan is to build the wrong type of house in the wrong place. There is no consideration for the infrastructure to support the addition homes.</p> <p>Local schools are at capacity and the plan just says "further discussions are needed with the county council"!</p> <p>The road layout cannot support this additional traffic. Most of the houses are off of small lanes. The A41 cannot cope with additional traffic.</p> <p>Houses should be built where people work not encouraging additional commuting and the additional pollution that goes with this.</p> <p>Why are we losing the only council building we have in Berkhamsted? Where will the police be based? Where will the Council meet? Where will people meet?</p> <p>In summary this plan wastes acres of farmland and beautiful countryside and damages the setting of the Chilterns Area of Outstanding Natural Beauty. It plans too many houses where there are too few local jobs, making commuting worse. The country needs affordable housing near jobs.</p>

Included files	
Title	Question: Any other comment
ID	EGS11098
Person ID	1258923
Full Name	Arthur Barfield
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty.</p>
Included files	
Title	Question: Any other comment
ID	EGS11106

Person ID	1268937
Full Name	Mrs Lynette Hyde
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	I have had infinite trouble in filling the Consultation Comments Form on line and ultimately phoned STEVE WILSON on the Strategic Planning Team who assures me that my comments will be considered. Please see my comments below,
Included files	
Title	Question: Any other comment
ID	EGS11116
Person ID	1268939
Full Name	Ms Sylvia O'Brien
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS11120

Person ID 1268953

Full Name Ms Susan Johnson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment 1 Initially, I wish to offer objections to the way the draft Plan has been put out to consultation. In view of the restrictions imposed by the Covid-19 pandemic, and the concomitant necessity of conducting everything on line, a substantial proportion of the public has been disenfranchised because they neither have access to computers, nor the

ability to use them. To my mind this renders the consultation void. The Plan should be withdrawn and rerun at a time when all residents can access it.

Included files

Title Question: Any other comment

ID EGS11175

Person ID 1262170

Full Name Julie Banks

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I have been unable to access the on-line portal, an issue with registration??

To sum up I am sharing my concerns around:

- 1 The numbers of houses we are looking to deliver.
- 2 The abilities of central government, HCC or utility companies to deliver the infrastructure
- 3 The wrong assumption that in the future society is going to be walking, cycling or jumping into electric cars – we live in a hilly landscape and as a commuter town our residents will be using their cars.
- 4 A desperate need and personal plea to protect our green belt, countryside and to be mindful of our existing communities and their over development.

My questions are rhetorical, I have had responses already via the delivery of the very useful and informative booklet that came through my letterbox and from visiting the virtual public consultation. I would like to congratulate the officer(s) that put that virtual tour together – amazing! User friendly, informative and very quick response from the ‘chat’ option. Unlike public facing consultation no time constraint, no queues and no need to rush. Having said that face to face is something I have missed no chatting with neighbours, officers or fellow event participants – I have missed the debate, can’t wait to get back to ‘normal’ and see the end of this pandemic.

Included files

Title Question: Any other comment

ID EGS11188

Person ID	1264551
Full Name	Mark Somervail
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>There has been inadequate public consultation.</p> <p>Many people did not receive the printed brochure at all. Residents on Darrs Lane did not receive it until it was specifically requested (how could they know to request something that had not arrived) and it did not arrive until 25th Feb. This allowed only 3 days for consideration and there was certainly not enough time for those without internet to view the plans in person or respond by post. The hard-copy brochure did not provide enough information for people to respond in the level of detail requested in this form. Those without internet have been completely disenfranchised.</p> <p>Many elderly people would be too afraid to attend the arranged viewings due to the risk of Covid for their age group.</p>
Included files	
Title	Question: Any other comment
ID	EGS11194
Person ID	1268980
Full Name	Ian and Pamela Gamble
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	We have grave concerns about the provision of medical care in the whole of Dacorum since we have so few Accident and Emergency hospitals to which we can go.

In Berkhamsted itself we are still in the middle of a number of processes of merging GP surgeries together. This has happen to us twice in the last few years and the current situation is as yet totally unknown as to whether we will have sufficient access to local GP services. In the few years we have had a particularly poor and unreliable service which has led us to complain to the local Clinical Commissioning Group and our grievance was upheld. So to rely on this new service for thousands of more patients, as it is untried and untested for the existing number of patients seems to be very rash to us.

We were very disappointed that we only found out about this consultation two weeks ago from neighbours in Berkhamsted and were then dismayed to find out that the whole of our (address removed) road here, close to where most of your developments are taking place, were also not in receipt of your plans!! The consultation should have started with us back in November 2020. There is a mountain of documentation to read through and it is totally unfair that we have only had days to read and reply to this.

Included files

Title Question: Any other comment

ID EGS11203

Person ID 1268982

Full Name Mr Andrew Yeomans

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

QUESTION ANY OTHER COMMENT comment

I support the submissions of the Chiltern Countryside Group (CCG) and the Grove Fields Residents Association (GFRA) on this question.

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socio-economic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation.

Whilst part of any planning consent for development of any large sites could require associated infrastructure provision and/or financial contributions from developers, historically, construction of such infrastructure lags behind development and occupation, thus putting pressure on existing resources for possibly many of the 18 year period of this Plan. Indeed, there is a risk, particularly with present economic uncertainties and unpredictability for the future, that developers could simply run out of money so key elements of infrastructure never gets built.

I support measures to improve the economy of the Borough's towns, but this should not be at the expense of developing sites which are already thriving businesses (such as Tring Brewery) or have historical value to the town (such as Tring Museum). I do not support the development of a new large supermarket on the edge of Tring as not only is this likely to attract shoppers away from the town centre shops & weekly markets but will also increase traffic. We find this completely unnecessary with the currently undeveloped Lidl site at Northchurch/Berkhamsted and the wide range of supermarkets already within a short drive & served by public transport.

Included files

Title Question: Any other comment

ID EGS11208

Person ID 1153900

Full Name Jackie Burwell

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>Swift numbers have declined across the UK by 53% between 1995 and 2016. By incorporating a Swift brick in all new houses, we can save these beautiful birds.</p> <p>Edward Mayer of Swift Conservation (www.swift-conservation.org) believes the way forward is to get swift bricks and boxes into local government plans. We should try to persuade architects, specifiers and their customers to have Swift facilities designed in from the very beginning - not as an afterthought or add-on. As a priority, we should try and get biodiversity features, including Swift bricks, established within local development plans. That will get them into new buildings.</p> <p>Edward Mayer has been very impressed with the work of Stephen Fit and the Duchy of Cornwall. Both he and Dick Newell have had excellent experiences working with enlightened housing associations in Ealing, Fulbourn, Newcastle and Cambridge.</p>
Included files	
Title	Question: Any other comment
ID	EGS11211
Person ID	1149643
Full Name	Mr Philip Burwell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>Swift numbers have declined across the UK by 53% between 1995 and 2016. By incorporating a Swift brick in all new houses, we can save these beautiful birds. On fine summer evenings Swifts gather in "low flying screaming parties" as they chase each other around the buildings where they nest. Because they rely on eating insects, Swifts can only live in the UK for a short period in summer when insects are plentiful. Swifts migrate south to Africa in August and return to us in the following May. Let's make sure we continue to have Swifts every summer.</p> <p>Edward Mayer of Swift Conservation (www.swift-conservation.org) believes the way forward is to get swift bricks and boxes into local government plans. We should try to persuade architects, specifiers and their customers to have Swift facilities designed in from the very beginning - not as an afterthought or add-on. As a priority, we should try and get</p>

biodiversity features, including Swift bricks, established within local development plans. That will get them into new buildings.

Edward Mayer has been very impressed with the work of Stephen Fit and the Duchy of Cornwall. Both he and Dick Newell have had excellent experiences working with enlightened housing associations in Ealing, Fulbourn, Newcastle and Cambridge.

Included files

Title Question: Any other comment

ID EGS11231

Person ID

Full Name

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS11255

Person ID 1268990

Full Name Mr Nick de la Bedoyere

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS11273

Person ID 1268893

Full Name Mr Martin Hopping

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.

Included files

Title Question: Any other comment

ID EGS11279

Person ID 221884

Full Name Ms Eliza Hermann

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment Due to the large number of issues, inconsistencies and flaws in the proposed Local Plan, if it goes forward to the Regulation 19 stage and then be submitted for examination, I believe it is likely to be found unsound, not justified, and inconsistent with national planning policy.

Included files

Title Question: Any other comment

ID EGS11298

Person ID	1268994
Full Name	Mrs Julie Hopping
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p> <p>The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.</p>

Included files	
Title	Question: Any other comment
ID	EGS11302
Person ID	1268998
Full Name	Mr Philip Hodgson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	PLease see all comments by Grove Fields REsidents Association. I agree with the detailed points they make.
Included files	
Title	Question: Any other comment
ID	EGS11326
Person ID	1269000
Full Name	Mrs Tracey Franklin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I am concerned that amongst the local community, there is a lack of knowledge about the local plan and it is only through the use of social media by local residents, that most people even know anything at all about the proposal.

Due to the current environment with COVID, I believe that the consultation should be extended by many more months, to give people the opportunity to view and comment on the proposal. As we are in lockdown, a lot of people are housebound and as such, do not have the facility to discuss with their fellow local residents or councillors, the full implications a development of this scale will do to our town.

I feel this whole proposal is outdated and has failed to take into account a number of important issues, mainly the prioritisation of brownfield sites to meet housing needs, the huge impact a development of this size will have on the physical and mental health of residents (both current and new) and the environmental impact.

Included files

Title Question: Any other comment

ID EGS11359

Person ID 221830

Full Name Mrs Baerbel de la Bedoyere

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS11367

Person ID 398597

Full Name Mrs Caroline Freer

Organisation Details Flamstead Parish Council

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

There is huge concern of the effect such vast numbers of dwellings proposed will have on already congested roads in all areas. Despite the idealistic ideas that new communities will all travel by local bus/walking and/or cycling, this is an unrealistic notion. Bus services which cater for outlying villages are consistently being reduced due to Government cuts/poor take up and unless this is addressed, you will always have a car-reliant population.

By increasing the numbers of housing and thus the population, the enjoyment of semi rural areas will be ruined and the reasons why people choose to live in smaller towns/villages in the first place will be negated.

Included files

Title Question: Any other comment

ID EGS11371

Person ID 1269016

Full Name Oliver Galliford

Organisation Details	Senior Planning Officer Hertsmere Borough Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Hertsmere would encourage Dacorum to consider potential options for addressing this shortfall in housing and employment need within their Borough, and would also welcome further discussions about how long term growth requirements can be addressed across the wider Housing Market and Functional Economic Market Areas as part of duty to cooperate discussions.
Included files	
Title	Question: Any other comment
ID	EGS11374
Person ID	1269016
Full Name	Oliver Galliford
Organisation Details	Senior Planning Officer Hertsmere Borough Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Hertsmere supports the key principles within Dacorum's new Draft Local Plan, including increasing the densities of development within urban areas. The plan is comprehensive and well supported by evidence; however improvements could be made to the document's layout so that it is easier to navigate. This was particularly apparent when looking at DM policies which referenced a certain location or policy area. Hertsmere does raise some concerns over the approach to meeting the identified needs for both housing and employment and further discussions with other members of the South West Herts area, including Hertsmere, are required to establish

how long term growth requirements can be addressed across the wider Housing Market and Functional Economic Market Areas.

Included files

Title Question: Any other comment

ID EGS11391

Person ID 1207629

Full Name Strategic Planning Department

Organisation Details Strategic Planning Department
Three Rivers District Council

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment As noted in reference to Policy SP4 (The Housing Strategy) in response to Question 2, DBC may need to include further sites in the next stage of the Plan as the figure of 16,596 net dwellings which the Plan identifies land for is based upon the Government's proposed revised standard method, which is no longer being taken forward following the Government's consultation. The housing target for DBC may therefore be higher than stated in this consultation version of the Plan and subsequently, further sites may need to be included in order for DBC to meet its local housing need figure.

Dacorum should also continue to engage with Hertfordshire County Council (HCC) to consider the potential of any of HCC's landholdings in the Borough which may be suitable and available for education use.

Included files

Title Question: Any other comment

ID EGS11418

Person ID 1269025

Full Name JOHN MAWER

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>The number of responses somewhat invalidates the exercise. In quantitative terms responses which can be counted on fingers from a population of 154,00 can have no significance at all. It is not the individual policies which are important but how they interact, and this is in essence what you appear to be trying to discover. It would have been helpful to delay this exercise until workshops could be organised.</p> <p>Lots could be gleaned from qualitative research, looking in more depth at what individuals or individual areas perceive as their issues, given the demands put on by central government.</p> <p>In my responses I can only respond to those things I understand. I can have no idea of the impact of specific policies on areas I don't know.</p>
Included files	
Title	Question: Any other comment
ID	EGS11473
Person ID	1269109
Full Name	CLAIRE JAMES
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p><u>Consultation:</u></p> <p>To undertake consultation during a period of lockdown when access to documents and officers other than over the internet or by email is totally inadequate. There are also many who do not have access to the internet and therefore have effectively been excluded from the consultation – neither having access to the consultation documents or the virtual exhibition.</p>

Publicity by Dacorum of the Local Plan and this period of consultation has been exceedingly lacking. Knowledge of the Local Plan, its consultation period, and issues debate would usually be assisted by word of mouth – neighbours talking over the garden fence, parents talking in playgrounds, social gatherings and clubs, activities meetings etc, none of which has been possible during the current pandemic and lockdown for most of the consultation period. There are still people who are only just finding out about the consultation two days before the closing date.

Therefore, this consultation has been doomed from the outset. A consultation that is the most crucial for decades due to the Governments interference on housing targets, and which will impact this and future generations. Yet, a majority of the public have not been able to comment.

Included files

Title Question: Any other comment

ID EGS11475

Person ID

Full Name

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment I am writing in response to the proposed Dacorum Borough Council Local Plan 2020 - 2038.

 Firstly I would like to say that neither myself or anyone in my neighbourhood have received any written information about the Local Plan. Many people are still unaware of the proposals - meaning those without computers or access to social media, are being denied a fair say.

Included files

Title Question: Any other comment

ID EGS11483

Person ID

Full Name

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Please see below for my feedback on the Dacorum local plan. My address is (address removed). I would be grateful if you could confirm that my comments will be captured as part of this consultation process. I started the process of using the portal but have been forced to abandon this for simpler format of an email.</p> <p>I attended the full DBC Council Meeting on Wednesday 24 February and listened to all the Councillors who spoke. I believe that DBC as a whole is doing an injustice to the people that they represent. Given that this plan is for 18 years it would seem obvious to all sensible people to have a proper consultation during a time when we are not constrained by government lockdown due to COVID 19. There is much in the plan which I don't fully understand in terms of technical language. It is a pity that there hasn't been more time to enable proper discussion.</p> <p>Some of the Councillors' double handed arguments of wanting enough evidence to respond to the UK government on their disapproval of the scheme (which they drafted) along with their refusal to extend the consultation or delay it until an appropriate time is conflicting and an obviously circular argument. The portal is obscure, unwieldy and difficult to navigate.</p>
Included files	
Title	Question: Any other comment
ID	EGS11507
Person ID	865014
Full Name	Mr Robert Turnbull
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty.</p>
Included files	
Title	Question: Any other comment
ID	EGS11520
Person ID	1269117
Full Name	ANITA PARRY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
QUESTION ANY OTHER COMMENT comment	<p>Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS11537
Person ID	1144732
Full Name	MR john reynolds
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>believe that this Consultation documentation has been put together to make it as difficult as possible for the residents of Dacorum to make a meaningful contribution.</p> <p>It has been rushed through at a time of National Lockdown thereby precluding local democracy to be fully empowered.</p> <p>From the information that has been provided there appears to have been no discussion by Dacorum Council with Government to review the number of homes decreed -- merely a weak acceptance of the Governments requirements. In particular there has been no questioning of the numbers that have been decreed which have moved around year by year.</p>
Included files	
Title	Question: Any other comment
ID	EGS11546
Person ID	1269121
Full Name	ALAN AND BARBRA CONWAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The public debate which would normally have given opportunities to scrutinise these proposals in detail has not been possible. The use of the internet and virtual meeting is not real alternative to public debate. It also excludes those who do not have access to the 'net'. The limited debate which has taken place has given ample evidence of the extent of public opposition and there is a deep rooted conviction that these proposals are being forced through with scant regard for the democratic process.</p>

The current situation is unique and without precedent for upwards of twelve months much of society has been under lockdown, with many working from home. If this were to continue on a significant scale the scale of development in the South-East would be significantly reduced.

Forecasting the future form of society is difficult at any time, at the present it is distinctly foolhardy.

Included files

Title Question: Any other comment

ID EGS11557

Person ID 1269122

Full Name KATHRYN WHITTLE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS11568

Person ID 1269123

Full Name KENTON WHITTLE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS11639

Person ID 1158198

Full Name JACK ARMSTRONG

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS11644

Person ID 1269148

Full Name SIMON AND ANNA BARNARD

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Regrettably, the Borough Council seems to consider that the Green Belt is open land ripe for development. This is contrary to Section 13 of the National Planning Policy Framework: Protecting Green Belt land. The Green Belt has been designated for a reason - 5 reasons to be exact and all of them have been blatantly ignored by the Council. It is not a sufficient argument to claim that the housing numbers must be met, especially as the government is reassessing the housing targets and the spatial location of new housing.

The Plan is also contrary to the Governments aims in Sn15 of the NPPF: Conserving and enhancing the natural environment.

para 170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

(a) protecting and enhancing valued landscapes, sites of biodiversity.....

(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

(d) minimising impacts on and providing net gains for biodiversity,....

(e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution....

Para 172 states: great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.....

The Plan pays scant regard to the conservation of the natural environment and certainly doesn't enhance it! Development on the scale and in the locations proposed will severely damage the CAONB (possibly National Park).

Included files

Title Question: Any other comment

ID EGS11645

Person ID 1269148

Full Name SIMON AND ANNA BARNARD

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The current situation has highlighted just how important open spaces are to the health and well-being of people and the loss of so much in Dacorum, especially around Hemel Hempstead, is totally unwarranted. As stated in NPPF, housing need alone is not an exceptional circumstance to allow such excessive loss of Green Belt land and such intrusive development. Around Hemel Hempstead alone some 392ha of Green Belt will be lost on the north side where there are 3 blocks of land proposed for development despite Dacorum itself acknowledging that this is an area of high landscape sensitivity.

The Plan promotes more and more development with scant regard to the effect on the existing settlements and residents. It is just a matter of development at any cost and the housing numbers maximised on every site regardless of the character of the area or constraints on the sites.

Somewhat ironic that in virtually every development site it is stated that it will provide open space - whilst building on open space and providing less! Extremely vague on how the public are to gain access to this 'manufactured landscape' instead of being able to enjoy the existing natural environment.

Given climate change has led to extremes of weather conditions and has increased the risk of flooding, no development should be provided on flood plains or land liable to flood.

The Plan claims to be sustainable, but the majority of the large-scale developments are located on the outskirts of the main towns some considerable way from existing facilities and transport hubs, resulting in more traffic, congestion on existing roads, disturbance, noise and pollution. Given the location of the town centres of Hemel Hempstead and Berkhamsted in the valley floor, walking and cycling is not an easy option and there is little or no public transport to these areas.

Major infrastructure investment seems to be targeted to the Hemel Hempstead Garden Communities proposal with little thought to the wider implications that this will have on the surrounding areas which are predominantly rural in character and within the CAONB. Again, it is car - driven with a proposed new link road which has effects on a wide area including the CAONB. However, with the changes in work and living styles, this approach is outdated and contrary to the government's climate change strategy. There is also some doubt about this development following the postponement of the St Albans Local Plan.

To conclude: the Campaign for National Parks states that the government revealed a commitment to create new National Parks, one of which could be the CAONB. They recognise the value to the nation of open space and the key part it will play in a '*green recovery*'. Therefore, there should be a pledge to protect and enhance local green spaces not wantonly destroy them by promoting excessive and unnecessary development.

As the Open Spaces Society in their 'Vision for Planning' has stated: '*Government, Local Authorities and our communities must all work together to provide everyone with access to good quality greenspace closer to home, a vital element of a green recovery following the pandemic.*'

Dacorum, in its rush to publish a Local Plan, has ignored not only the government's questioning of its own housing numbers but also the effects of the pandemic which has changed how everyone lives and the necessity to combat climate change which will not happen with excessive and poorly planned development. The Plan is premature, contrary to the policies in the NPPF, is severely damaging to the environment including the CAONB and consequently on climate change. It is a disastrous plan to both the environment and the existing settlements, it is clearly unsound and should be either radically changed or withdrawn.

Included files

Title Question: Any other comment

ID EGS11656

Person ID	1269150
Full Name	Mrs Helena Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am very concerned that a lot of Berkhamsted residents are unaware of the local plan and the emerging strategy for growth and that the consultation period is due to close.</p> <p>Due to the COVID-19 pandemic and the restrictions placed on everyone there has been very little chance for people to become aware of the details of the Emerging Strategy for growth and the impact that this will have on residents.</p> <p>Due to COVID-19 it has not been possible for interested parties to:</p> <ul style="list-style-type: none"> • meet to discuss the plans and formulate responses • door to door canvassing • information displays at local markets • attend council meeting to raise issues • hold information evenings/meetings <p>I believe the council should extend the consultation process until the current crisis is over and allow full engagement by all Dacorum residents.</p> <p>I also believe the plan is not considering the detrimental effect to the environment of such large numbers of housing developments. The removal of green belt land should not be allowed - at least not to the extent that the plan proposes.</p>
Included files	
Title	Question: Any other comment
ID	EGS11668

Person ID	1269152
Full Name	SIMON RHEAD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment

ID	EGS11701
Person ID	1146103
Full Name	Mr Simon Toon
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>People without good access to the internet and without a computer have been disadvantaged and excluded from this consultation as libraries are closed (to view the consultation) and to respond (responses seem to require web access/email).</p> <p>There have been technical difficulties which discourage engagement. I have asked for a password reset for the portal four times now, and I am still waiting to receive it. Hence I am emailing my comments instead.</p> <p>Draft Dacorum Infrastructure Delivery Plan (Nov 2020): https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-draft-infrastructure-delivery-plan---november-2020.pdf?sfvrsn=a2cf0c9e_8</p> <p>Berkhamsted and Tring Transport Strategy (Apr 2020) https://www.dacorum.gov.uk/docs/default-source/strategic-planning/berkhamsted-and-tring-sustainable-transport-study.pdf?sfvrsn=42ce0c9e_4</p> <p>Given how extensively the draft IDP is referred to throughout the Plan, it is ridiculous that no link was provided to enable residents to review it to get the full picture. Even after I had found the Draft IDP, I was still unable to evaluate the full detail of the proposed infrastructure provisions, as</p>

locating a copy of the Berkhamsted and Tring Transport Strategy document. These documents should have been provided in the supporting consultation documents.

I would like to state that Northchurch is a village (we have a parish council) and we are not merely an “urban area” of Berkhamsted as stated in this Plan. The fact that Table 1 in Section 6 does not include Northchurch under 'villages', is an omission.

Similarly, to state again, the numbers from Central Government this consultation is based on are wrong. I do not have time to find the relevant bit in your evidence base to prove this point, which was made by your ruling party Tory councillors in the full council meeting on 25 February 2021. The point has also been made by LibDem councillors and solicitors who have looked into this so I am confident to base my objection on it.

I have just learned that the Council will treat the pre-printed feedback form from Thakeham developers, which people just need to sign and date and send back, with equal weight as the responses received in the portal. It took me several hours to make my objections while it would have taken me 2 minutes to send an approval. Therefore I believe this process is unfair as it encourages positive responses and discourages negative ones.

Lastly, I question whether during a pandemic and through lockdown was the best time to hold this consultation. Many people are busy at work, home-schooling, ill with Covid, have lost loved ones, are not coping and shouldn't have been expected to deal with such an important consultation on top of all that.

Included files	
Title	Question: Any other comment
ID	EGS11717
Person ID	1269217
Full Name	Mr David Hulse
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS11733
Person ID	1152494
Full Name	MRS G RUSSELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Plan is based on a flawed assessment of future housing need, and this assessment is excessive. This and the suggested level of other development disregards the impact on the environment, infrastructure, climate change and biodiversity, and would cause significant harm to the Green Belt and the AONB. It also jeopardises plans, currently being discussed, to potentially extend the AONB or upgrade its status to that of a National Park.</p> <p>The Strategy also fails to take into account the combined impacts of the coronavirus pandemic and recently expanded permitted development rights, both of which create many more opportunities for conversion of commercial space (especially office and retail) to residential use, and thus windfall provision of housing throughout the Borough is likely to be much higher than estimated. A more positive place making strategy is needed as part of a formal brownfield land review to realise local enhancement of the existing built environment with benefits for existing residents. Regeneration of previously developed land would reduce the intake of greenfield land.</p> <p>The Plan is not sustainable, in many respects. It contravenes NNPF with regard to environmental concerns and statutory protection duties. This and the problems of water supply and waste water disposal necessarily limit the degree of development that can be allowed. DBC must revise its ambitions.</p> <p>It is not sustainable to aim for ever more commercial and industrial growth and massive increases in housing in the area. This must be recognised. Other parts of the country need development and appropriate housing, to make society fairer.</p>
Included files	
Title	Question: Any other comment
ID	EGS11734
Person ID	1152494
Full Name	MRS G RUSSELL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>Please find attached my responses to the Consultation Comments form. I could not download the form in a format which I could complete on the computer, so I have typed my responses, put them on the form and scanned it, and am attaching this as "DBC Local Plan Questionnaire".</p> <p>But this is not very easy to read, so I have also attached my typed responses to the questions, file name "Responses to DBC questionnaire on local plan".</p>
Included files	
Title	Question: Any other comment
ID	EGS11747
Person ID	1269230
Full Name	CHARLES GABRIEL
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Having lived in this town my entire life I have witnessed the removal and deconstruction of practically all of the best adult/family entertainment venues in this town - the Pavillion, countless pubs that hosted live music as well as social clubs, nightclubs, bars, arcades, swimming centres, bowling, pool halls, Quasar, and many others. To compound this, the population has grown significantly already and the residents are feeling it.</p> <p>Not planning to provide social activities for residents is highly detrimental to people's mental, physical and social health. Planning to increase the population of the borough by an additional 50,000+ people without planning for these improvements will compound this issue even further. Residents need to be provided with a wide variety of options for things to do. There's only so many times you can go for a meal and head to the cinema.</p> <p>High streets should no longer be focused purely on shopping, which is being driven out by online shopping, and instead should offer a range of entertainment venues for residents. This will provide jobs and bring high streets to life. Entertainment venues should be suitably sized. The Old Town Hall has a capacity of around 100 people. This is not suitable to cater for a growing town which will soon have a population to rival cities. Entertainment venues can cater for local groups such</p>

as amateur dramatics, local music festivals, open mic nights and then have the potential to draw in larger acts in terms of comedians, musicians and bands, theatre productions, etc.

After COVID, people will be craving and valuing these facilities more than ever before.

Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite.

Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced.

Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.

All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.

- The 40% minimum affordable homes objective should be enforced across the Too often developers in the past have been allowed to waive their affordable homes commitments.
- Trees and woodland are very valuable to the environment and the community's physical and mental I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area.
- An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife
- Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.

- The Local Plan should allocate land for new allotments for resident of new homes as well as laying out gardens to support 'Growing your own'(which is both sustainable and good for mental health)
- Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.

Additionally, some people that I know received a leaflet through the door regarding the local plan. However, an equal amount of people I spoke to did not receive this - it is suggested this is picked up with your distribution company!

Included files

Title Question: Any other comment

ID EGS11759

Person ID 1269233

Full Name CIARA KENT

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure

associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS11760

Person ID 1118045

Full Name Mr Pdraig Dowd

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Thank you for the provision of information regarding the Draft Local Plan.

This enables the local community to consider and engage in the future of what it wants it to look like and to be a place to live healthily and happily in. As I observe this broad based engagement, DBC is now equally obligated to actively and directly respond to this by accepting the views of the local community.

As this is an engagement, my view is that this requires a significant rethink and next time, to start with a fully documented plan to first address what is missing here.

Included files

Title Question: Any other comment

ID	EGS11781
Person ID	871625
Full Name	Mrs Clare Francis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS11794

Person ID	1264468
Full Name	Melanie Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Having lived in this town my entire life I have witnessed the removal and deconstruction of practically all of the best adult/family entertainment venues in this town - the Pavillion, countless pubs that hosted live music as well as social clubs, nightclubs, bars, arcades, swimming centres, bowling, pool halls, Quasar, and many others. To compound this, the population has grown significantly already and the residents are feeling it.</p> <p>Not planning to provide social activities for residents is highly detrimental to people's mental, physical and social health. Planning to increase the population of the borough by an additional 50,000+ people without planning for these improvements will compound this issue even further. Residents need to be provided with a wide variety of options for things to do. There's only so many times you can go for a meal and head to the cinema.</p> <p>High streets should no longer be focused purely on shopping, which is being driven out by online shopping, and instead should offer a range of entertainment venues for residents. This will provide jobs and bring high streets to life. Entertainment venues should be suitably sized. The Old Town Hall has a capacity of around 100 people. This is not suitable to cater for a growing town which will soon have a population to rival cities. Entertainment venues can cater for local groups such as amateur dramatics, local music festivals, open mic nights and then have the potential to draw in larger acts in terms of comedians, musicians and bands, theatre productions, etc.</p> <p>After COVID, people will be craving and valuing these facilities more than ever before.</p> <p>Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite.</p> <p>Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced.</p>

Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.

All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.

- The 40% minimum affordable homes objective should be enforced across the Too often developers in the past have been allowed to waive their affordable homes commitments.
- Trees and woodland are very valuable to the environment and the community's physical and mental I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area.
- An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife
- Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.
- The Local Plan should allocate land for new allotments for resident of new homes as well as laying out gardens to support 'Growing your own'(which is both sustainable and good for mental health)
- Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.

Included files	
Title	Question: Any other comment
ID	EGS11832
Person ID	350823
Full Name	Mrs Sue Yeomans
Organisation Details	Chairman Chilterns Countryside Group
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I fully endorse the response of the Chiltern Countryside Group to this question.
Included files	
Title	Question: Any other comment
ID	EGS11838
Person ID	1269253
Full Name	NIKKI GREENAWAY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I am writing to request that Dacorum Borough Council withdraw the local plan that is currently under consultation. Unfortunately the pandemic has not allowed the correct level of public engagement to take place on a matter that effects each and every one of your residents until 2038.

Included files	
Title	Question: Any other comment
ID	EGS11845
Person ID	1269257
Full Name	FRANKIE BIRCHAM
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS11857
Person ID	1207341
Full Name	Mr Adam Wood
Organisation Details	Growth and Infrastructure Manager Hertfordshire Local Enterprise Partnership (and Herts IQ)
Agent ID	1264277
Agent Full Name	Rob Shipway
Agent Organisation	Lead Consultant Civix

Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>I am having to send this to you via e-mail as I have been unable to either login or register – I needed to seek login details but have received no confirmatory e-mails from you to enable me to do this; I have then tried to register with different details and again, I have received nothing from you.</p> <p>Equally I have found the pdf download impossible to edit successfully, so have resorted to converting this to a word version and then converting it back. I enclose two versions (Word and PDF) as I am not confident about legibility of either.</p> <p>I have found the whole process both time consuming and extremely successful, especially as I am without technical support at the moment. I fully accept that the problem may be at this end but I don't think your arrangements are user friendly and I could not see any way of getting technical support when I set out to upload the response in what I imagined would be a straightforward and hassle free process.</p>
Included files	
Title	Question: Any other comment
ID	EGS11884
Person ID	1269277
Full Name	DEFINE PLANNING AND DESIGN LTD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Whilst there has been considerable effort in the plan's production, BHL is concerned that it is not sufficiently succinct and a number of its policies are too lengthy. For example, some policies attempt to address multiple key issues and are therefore overly complex; in contrast to the objectives of NPPF paragraphs 15 and 16. To reduce the plan's size, it is suggested that DBC undertake a review of the plan's supporting text to ensure that it only includes that information that is relevant to the plan's interpretation.</p>
Included files	

Title	Question: Any other comment
ID	EGS11925
Person ID	1269346
Full Name	JED GRIFFITHS
Organisation Details	KINGS LANGLEY & DISTRICT RESIDENTS' ASSOCIATION
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	1 The Borough Council is urged to withdraw this proposal and to re-consider its strategy for Kings Langley in consultation with local stakeholders and Three Rivers District
Included files	KLDRA Response to DBC Local Plan - FINAL - 20210225.pdf
Title	Question: Any other comment
ID	EGS11931
Person ID	1150963
Full Name	SUE TAYLOR
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I have spoken to my contacts across party political divides and from those living on benefits to the most well heeled in our community, in Tring, Hemel, Northchurch and Berkhamsted, all have expressed concerns over the consultation

process during this pandemic (none heard of the proposals from Dacorum Borough) and the scale of the proposals which are out of proportion to the local housing needs.

This Consultation is to listen to the local residents, I trust that you will take our views and concerns into account as the plan is finalised.

Included files

Title Question: Any other comment

ID EGS11932

Person ID 1150963

Full Name SUE TAYLOR

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I am writing to you both as a local resident and as someone concerned with the regional and therefore national implications of the impact of these proposals on our natural infrastructure and biodiversity.

I have lived in Berkhamsted and Northchurch for over 50 years and so many of my points address specific issues here but I know, through my connections elsewhere in Dacorum, that many of the issues are true for Tring and Hemel too.

I am a local naturalist and volunteer recorder for Butterfly Conservation, BBOWT, HMWT and the National Trust specialising in entomology.

I agree a local plan is needed and that Dacorum needs to change to meet future challenges, but this should not be by simply expanding the urban footprint at the expense of the ever decreasing natural and seminatural green infrastructure which supports our biodiversity as well as our physical and mental health and wellbeing. There are other more creative solutions that need to be sought and investigated.

The Consultation Process

I have spoken to well over a dozen people in Berkhamsted, Northchurch Tring and Hemel and none have received notification from Dacorum Borough Council of the Proposed Local Plan, none have received the brochure and so were

unaware of the consultation deadline. For many my contact has been the first they had heard of it. Others had heard by word of mouth, all were shocked at the scale of the proposals for housing.

Covid 19 has put so many people under pressure, many people simply do not have time to make the response they would wish to, I know households who do not have the appropriate technology to view the on-line documents and cannot access the local library even when it is open and so cannot make the depth of objection they would want to.

I therefore believe that the Consultation Process for the Local Plan has been inadequate and that the number of responses will not be representative of the views held in the Community. It should be stopped until the pandemic allows a fairer consultation to take place.

You cannot assume that people not objecting assent to the plans when so many people have not been informed of the consultation.

Included files

Title Question: Any other comment

ID EGS11940

Person ID 1145687

Full Name Mrs Polly Walker

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Finally, I feel there has been a deliberate lack of consultation of the development plans within the local community. Barriers have been created by the national lockdowns in terms of information relating to the proposals being readily accessible – especially to the elderly and vulnerable members of the community – and this has not been taken into account. Those that are not digitally competent or able to access means of digital communication have been restricted in their opportunities to express their views – surely this compromises the Dacorum Borough Council commitment to equal opportunities and inclusivity?

I fear that pursuing these ill thought proposals will have a catastrophic and irreversible impact on the town of Berkhamsted, it's people and community, and the magnificent countryside that we are fortunate enough to be able to immerse ourselves in and urge you to consider alternative redevelopment opportunities instead.

Included files	
Title	Question: Any other comment
ID	EGS11948
Person ID	1150963
Full Name	SUE TAYLOR
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I am sorry if you feel my objection is too long but would remind you that you are expecting your residents to read and understand the 359 page Local plan Proposals document and all the supporting information, even though most are struggling with everyday jobs, families and the increased demands and strains caused by Covid19.
Included files	
Title	Question: Any other comment
ID	EGS11964
Person ID	1269350
Full Name	Jan Dent Safer Gravel Path Action Group
Organisation Details	SECRETARY Safer Gravel Path Action Group
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	Failing to change the DBC Local Plan to take account of these objections, will render many consequent planning actions to be open to judicial review, delaying action, incurring huge cost and generally wasting time, money and effort that DBC can ill afford. The strength of local option and the weight of objections should cause DBC to pause, reconsider and update its plan based on up-to-date and more relevant data. DBC should listen to its residents and push back on the Government's housing targets for our area, making the legally valid case that these targets are based on the wrong data.
Included files	
Title	Question: Any other comment
ID	EGS11980
Person ID	1264526
Full Name	Peter King
Organisation Details	Water End & Upper Gade Valley Conservation Society
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>9.1 Scale</p> <p>The potential of an almost tenfold increase in houses in Great Gaddesden Parish is incredible. The Parish is well spread out with a number of hamlets as well as the village centre housing the Church and War Memorial. The impact of this development on the existing community is not properly considered by the Plan. Great Gaddesden has an interesting and valuable historical heritage.</p> <p>9.2 Traffic Movements</p> <p>Very little consideration has been given to the traffic movements of those who would live in the Garden Community. Where the people will travel to work , to school and for recreation. For example there are significant employment opportunities in towns like Leighton Buzzard, there are village schools in Great Gaddesden and Gaddesden Row and those who want to head North on the M1 may well choose to travel along the B440 to the road linking up to the M1 at junction 11A so avoiding Junctions 9,10 and 11. All bringing very significant travel through the Valley.</p> <p>The Water Meadows in Great Gaddeden are attracting the Dog Walking businesses. No doubt a proportion of the population in the Garden Community would have dogs and so will travel into the AONB for this. This is just one of many reasons why those living in the new developments would travel into or through the Gade Valley.</p>

9.3 ANOB

For many reasons the increased population envisaged by the Plan will go into the Upper Gade Valley and so bring pollution in all its forms. Pollution which will damage the river, the many forms of wildlife and the varied flora. This area is favoured by walkers who use its many footpaths. It is already almost overwalked.

The increased population would bring about increased events taking place in the countryside and so cause damage

The Society believes the impact will result in what is now an AONB no longer qualifying for that status.

9.4 Brexit & Coronavirus

The impact of both Brexit & the Coronavirus Pandemic are of course not considered but they will need to be in the future so that a better solution can be found which will preserve our countryside but meet housing needs.

Included files

Title

Question: Any other comment

ID

EGS11984

Person ID

333667

Full Name

Mrs Patricia Simons

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

This Draft Plan is of huge importance to the development of Berkhamsted and Dacorum. It should be delayed because although available on-line many people are unaware of these new plans and their implications. Past consultations have included local exhibitions and planning meetings.

To proceed would be to disregard and evade the democratic consultation process under the guise of a global pandemic.

Included files

Title

Question: Any other comment

ID

EGS12014

Person ID	1269353
Full Name	TESSA BARFIELD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty.</p>
Included files	
Title	Question: Any other comment
ID	EGS12039
Person ID	1269358

Full Name	Mr Tim Duggleby
Organisation Details	Associate Director Redevelopment Programme West Hertfordshire Hospitals NHS Trust
Agent ID	1269359
Agent Full Name	Mr Tom Rudd
Agent Organisation	BDP
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The future acute healthcare provision from the Hemel Hempstead site will recognise the increased demand on services that will arise from the developments identified in the Plan. The Trust's redevelopment plan ensures healthcare provision remains a key component of the updated Hemel Hempstead Town Centre Masterplan.
Included files	
Title	Question: Any other comment
ID	EGS12052
Person ID	330363
Full Name	Mr. Graham Lay
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	It appears a lot of work has been done on the plan with lots of studies and philosophies developed over the years. It has been a great money-spinner for a few, I'm sure. Whereas I'm in agreement that a planning policy is required (I have lived in Houston, Texas, where there is no such plan), I find the extrapolation of housing and business requirements and needs into the future to be just so much guesswork.

The current pandemic has changed work and living attitudes as has the increase in internet use for working, shopping and commercial transactions. There are likely to be some major changes in the demand for housing and commercial buildings and on the demand on infrastructure following the pandemic. The assumptions made twenty, fifteen, ten and even three years ago are not likely to be valid in the near future and certainly not further ahead.

This strategy needs to be reconsidered in 2022 before any action is implemented.

Included files

Title Question: Any other comment

ID EGS12062

Person ID 1264202

Full Name Philippa Wosiek

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

As mentioned previously, the Plan is not up-to-date and has not taken into account the negative impact of doing this consultation during a pandemic. A revised Local Plan needs to be put forward for the community to comments upon.

Dacorum is supposed to represent all its residents - relying on everyone having access to IT is fair. Relying on everyone's IT skills being sufficient to navigate your documents and form filling process is not fair.

If you truly represent all those living and working in Dacorum and particularly during this last year, access to this very important consultation should be all inclusive ie proper clearly written documents mailed out to every single address in Dacorum. We only received your brochure on 23 February after I had raised a complaint through your complaints system. Strategic Planning replied naturally detailing all the online ways I could access said documentation but at no time was there a reason given as to why many streets had been left out of a very important mailing. If you are going to use the reason of the recent pandemic, then Dacorum should appreciate that every single resident has reason to use the pandemic as the reason why they have not been able to access, evaluate and respond to the Local Plan.

Included files

Title Question: Any other comment

ID EGS12066

Person ID	1264913
Full Name	ian Stephenson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Whilst reasonably familiar with all of the proposed sites (pages 299 to 314 of the consultation document), I walked past all of the sites this morning so most of the comments are current.</p> <p>I am a chartered Civil and Structural Engineer still currently practicing. This note will cover the following items:</p> <ul style="list-style-type: none"> • General Comments on the presentation of the information and the timing; • General Comments on the Proposals; • Comments relating to specific sites where there are important issues that need to be commented • Summary <ol style="list-style-type: none"> 1 The maps that have been produced in the documents are of very poor quality and when printed out on A4 sheets (as the document is formatted), many of the important features and buildings are not clear. It is very difficult to identify key buildings such as Ashlyns School, the British Film Institute, etc. Even walking past the sites this morning, it was very difficult to ascertain the exact areas where works are 2 Unless you are actually on site it is impossible to recognise street names from the drawings. 3 There are sites that are part hatched in green, whereas the entire piece of ground is of the same use, which in most cases is farmland. 4 Each of the proposals are very site specific and there is no clear indication that there are sites immediately adjacent to them that form part of these proposals. It is not clear why these are not combined as in combination, the infrastructure to support the site in terms of road layouts, services, etc., might be more 5 A couple of sites have no direct access to roads. 6 The are areas that are clearly 'woodland', but these are not distinguished from 7 There are areas on the plan that are shown are undeveloped, but in reality have houses being built upon them or are currently being built upon. 8 In each area it simply states 'around XXX dwellings, subject to masterplanning'. Very little information is given what form those dwellings may This needs to be clarified. 9 The term 'masterplanning' in this context is very vague. What does it actually mean and to what level of detail will be required?

- 1 I am not aware when this information entered the public domain, but the amount of information that is required to be read and absorbed is extensive and a significant of time ought to have been allowed for this.
- 2 Lack of a local press or notifications by way of flyers means that there is very little knowledge about the existence of these proposals. I do not use or rely on social media in any shape or form and would be disappointed if this was the primary means of communicating this
- 3 The information has been issued in winter and hence it is more difficult to get out and view the sites.
- 4 We are in the midst of a pandemic and understandably we cannot have meetings, etc., where these items where these items can be presented by the Council and debated. This process ought to have been delayed in order that formal consultations can be held.
- 5 The document relates to around 2500 dwellings proposed in Berkhamsted. It does not seem to mention the proposed development that has been pulled together by Thakeham and Berkhamsted Sports Ground Charitable Association. This information was distributed in Berkhamsted by way of flyers in the last few months. These proposals are not included in the Dacorum Plan. They relate to a section of land to the east of Hall Park up to near Bourne They propose around 1100 houses.
- 6 In the light of item 14 above, are we talking about 3,600 dwellings?
- 7 Given the impact on what has happened during the pandemic and the way people work and commute are the figures that are being looked at still relevant. Have they been reconsidered in the light of what has happened in the last year and what may happen in the
- 8 What research has been carried out in terms of possible changes to work patterns as a consequence of the

Included files

Title Question: Any other comment

ID EGS12082

Person ID 1269372

Full Name MATTHEW SPEED

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

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It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS12095

Person ID 1269386

Full Name KERR LINDA

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes

* No	
QUESTION ANY OTHER COMMENT comment	please refer to the comments made by Tring in Transition. There are many points which need to be addressed which have been itemised.
Included files	
Title	Question: Any other comment
ID	EGS12111
Person ID	1145854
Full Name	Mrs Deborah Doughty
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside</p>

of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS12155

Person ID 1160677

Full Name Mr Paul Doughty

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Finally, the schools, dentist and doctors in Tring are at capacity. The nearby Hospitals are struggling to cope with the current increase in housing and population in the area .

Therefore, any big developments cannot be allowed to start without the relevant support for the communities being in place.

Any developments should be based on 'real' affordability of housing for the young and less well off, and not end up being targeted mainly at the wealthy and investors.

I further feel that a pause in the process should take place to allow a proper review to be conducted when the country is open once more for post-covid

In addition, the effects of work patterns and requirements for housing after the effects of Covid and Brexit have to be taken into account once a clear view of these two major upheavals can be made.

Included files

Title Question: Any other comment

ID EGS12173

Person ID 1269444

Full Name Mr & Ms Jim & Katie Barnard & Partridge

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown. Consequently, I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard</p> <p>— Those without access to IT have defacto been excluded from this process, given lockdown access restrictions. Lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation. It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown.</p> <p>Furthermore, it would be reasonable to expect that consultations involve public meetings where officers can explain what is proposed and answer questions</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown</p> <p>PLEASE NOTE: Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".</p>
Included files	
Title	Question: Any other comment
ID	EGS12182
Person ID	1269448
Full Name	Mr John Mardell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Recommend a thorough review with representatives from the local residents to balance the process.

Included files	
Title	Question: Any other comment
ID	EGS12192
Person ID	399285
Full Name	Mr John Roberts
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>To summerise:- I disagree with these proposals for the Local Plan and the housing numbers proposed. To build even more houses in Berkhamsted and especially along Shootersway and Kingshill Way will be disastrous! The local water supply to Berkhamsted is already on a knife edge with the existing number of dwellings - so how are you going to supply all this additional water for another 2,000 plus houses in Berkhamsted??</p> <p>These housing numbers in the Local Plan for Dacorum and therefore Berkhamsted are excessive and totally wrong. The impact on the infrastructure, increased pollution, increased congestion in Berkhamsted which is already now gridlocked at peak traffic flow times and therefore continue to give major road safety concerns. What consideration has been given to the impact on the local ecology and the well being of existing local residents - the plans would indicate that the answer is none .</p> <p>Therefore I totally disagree with the Dacorum Local Plan 2020 to 2038 and the Key Developments in Berkhamsted.</p>
Included files	
Title	Question: Any other comment
ID	EGS12205

Person ID	1145481
Full Name	Mr Brian Kazer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>First, to say that I very strongly support the constructive suggestions in answer to question 9 from Tring in Transition's submission. I would ask that they are carefully read and taken on board.</p> <p>Whilst I recognise that planners are between a rock and a hard place when it comes to Local Plans in the Home Counties, it is profoundly disappointing that DBC has not pushed back hard on the Government's insistence on maintaining the out of date 2014 population projections as the basis for calculating housing requirements. Had that been done, much of the anger generated by this Plan may well have been minimised.</p> <p>I have tried to be constructive in my comments, but am left feeling that despite many well intentioned, and welcome, positive intentions, the Plan seems very much to be developer-driven. I had hoped to be excited by vision and ambition, but am left disappointed.</p> <p>Hope remains!</p> <p>However there is still hope, both regarding Tring which carries a disproportionate burden which will generate gridlock, and regarding Dacorum generally.</p> <p>How?</p> <p>For Tring, by adopting the "Vision" approach advocated by Barr Kazer and reproduced earlier in my comments.</p> <p>For Tring and Dacorum, by involving local communities in developing the Design Plans for their communities rather than presenting fait accompli drawn up by consultants. That would both address the "distinctive development" referred to in Plan, and also go some way to restoring the faith of people in process.</p>
Included files	
Title	Question: Any other comment

ID	EGS12206
Person ID	1269456
Full Name	Mr & Ms R & C R & Wilby
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>We am writing to lodge a complaint about the current Dacorum Local Plan consultation. I DO NOT comprehend why you see fit to proceed with such an important consultation in the middle of a national pandemic.</p> <p>The first we heard of this consultation was on the afternoon of Tuesday 23rd February when a leaflet from our local Liberal Councillor (Lara Pringle) was posted through my door. I telephoned Dacorum Planning on the following morning and fortunately a Planning Officer rang back and agreed to send out your consultation brochure. This duly arrived on Thursday, leaving me with only 3 days in which to submit any comments. I was informed that it was unfortunate that we had been overlooked when this document was distributed.</p>
Included files	
Title	Question: Any other comment
ID	EGS12216
Person ID	1269472
Full Name	MARGARET RITCHIE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

<p>QUESTION ANY OTHER COMMENT comment</p>	<p>I am a long-time resident of Berkhamsted and responded to the 2017 Consultation, with comments of concern, including support of homes location option 1B. I know many fellow residents made the same choice and was surprised and disappointed that this was not reflected in the proposals on which the new consultation comments are invited.</p> <p>Please accept this letter as my only comments on the matter; I commenced the on-line version but would prefer my response to reflect only the Berkhamsted situation, which I know well.</p> <p>OVERALL POSITION</p> <p>Firstly, may I add to the many voices, who have asked DBC to abandon the current process, for the following reasons:</p> <ol style="list-style-type: none"> 1 The Covid lockdown has not allowed residents to follow fully the thousands of pages of the (at last) published data, nor to consult in any meaningful way with Planning Officers, local Councillors and other local associations. 2 This will surely result in the response levels being so low that they will not represent public comment at an acceptable sample level. 3 The huge changes in the central Government's housing number parameters make the target objectives meaningless. Worse, the current process simple allows developers to "line up" included sites for their own planned use, either inside or outside the Local Plan. <p>The argument, that the present process has cost a considerable sum, which would be wasted if abandoned, is not a good reason for continuing on the wrong path. The cost, versus parts of the Borough having a completely unacceptable planning future, are meaningless.</p>
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Included files	
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Title	Question: Any other comment
ID	EGS12221
Person ID	1269475
Full Name	DR EMMA SHERRINGTON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

<p>QUESTION ANY OTHER COMMENT comment</p>	<p>Firstly, I wish to object to how the "public consultation" on the Local Plan has been conducted by Dacorum Borough Council. The proposal to build nearly 17,000 new homes in the area has not been widely published by DBC. I live in</p>
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a terrace house on a road in Berkhamsted that is in one of the areas where house building is proposed to occur directly behind my property. I have had no direct communication from DBC at all, no leaflet, no letter, no email, nothing.

We are in the middle of a pandemic where gathering together face-to-face is virtually impossible. Only those with access to social media and virtual meeting technology have had any chance of discovering these momentous plans to change our borough. This has disenfranchised and disadvantaged huge sections of the population of Dacorum. Also, due to the pandemic the community has been focussed on surviving: COVID-19 health related challenges; isolation, unemployment, home-schooling; to mention just a few. DBC appears to be taking advantage of a distracted populus to slip these development plans past us without due scrutiny. Your own publicity states that these changes will affect the area for generations. How can you do that without allowing the community to have a proper say on what happens to their local area, THEIR HOME.

Included files

Title Question: Any other comment

ID EGS12229

Person ID 1269476

Full Name EMILY DAVIES

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Having lived in this town my entire life I have witnessed the removal and deconstruction of practically all of the best adult/family entertainment venues in this town - the Pavillion, countless pubs that hosted live music as well as social clubs, nightclubs, bars, arcades, swimming centres, bowling, pool halls, Quasar, and many others. To compound this, the population has grown significantly already and the residents are feeling it.

Not planning to provide social activities for residents is highly detrimental to people's mental, physical and social health. Planning to increase the population of the borough by an additional 50,000+ people without planning for these improvements will compound this issue even further. Residents need to be provided with a wide variety of options for things to do. There's only so many times you can go for a meal and head to the cinema.

High streets should no longer be focused purely on shopping, which is being driven out by online shopping, and instead should offer a range of entertainment venues for residents. This will provide jobs and bring high streets to life. Entertainment venues should be suitably sized. The Old Town Hall has a capacity of around 100 people. This is not suitable to cater for a growing town which will soon have a population to rival cities. Entertainment venues can cater for local groups such as amateur dramatics, local music festivals, open mic nights and then have the potential to draw in larger acts in terms of comedians, musicians and bands, theatre productions, etc.

After COVID, people will be craving and valuing these facilities more than ever before.

Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite.

Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced.

Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.

All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.

- The 40% minimum affordable homes objective should be enforced across the Too often developers in the past have been allowed to waive their affordable homes commitments.
- Trees and woodland are very valuable to the environment and the community's physical and mental health. I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development
- An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife

- Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.
- The Local Plan should allocate land for new allotments for resident of new homes as well as laying out gardens to support 'Growing your own'(which is both sustainable and good for mental health)
- Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.

Additionally, some people that I know received a leaflet through the door regarding the local plan. However, an equal amount of people I spoke to did not receive this - it is suggested this is picked up with your distribution company!

Included files

Title Question: Any other comment

ID EGS12234

Person ID 1149618

Full Name Mr John Brabner

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

- 1 It is considered totally inappropriate to carry out this consultation during the social restrictions imposed by Covid-19, with the resultant lack of easy access to proposals and Council staff to question the plan's thinking and detail.
- 2 Admirable though the plan and all the associated online materials may be, they do not lend themselves to adequate and widespread public interrogation and expression of opinions and comments.

3 Finally, I repeat my view and request that this consultation be delayed until Covid-19 restrictions have been relaxed, allowing a more complete view to be taken and expressed by a larger section of the affected population.

Included files

Title Question: Any other comment

ID EGS12249

Person ID 1269479

Full Name BARBARA HARVEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship

with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

The pandemic has proved more than ever before the need for space, countryside and for dispersing people away from congested housing. Why then would you create the very style of development that would bring people into an increasingly crowded area. The increased use of Ashridge, canal footpaths and - when open - College Lake means even with the current population the precious wildlife and vegetation is under pressure.

This Plan should be reviewed wholesale in the context of the massive changes to the way we work and live that have been brought about by Covid 19 and the shift to online commerce and home working. Increasingly large town centres like Hemel and Watford are left vacant, inciting vandalism and a feeling of decay that seeps into how the people around those areas see and treat them. Why not radically redevelop these areas - already built on - into innovative, new, eco-sensitive living centres that help us lead the way in future planning and living.

Included files	
Title	Question: Any other comment
ID	EGS12254
Person ID	1227654
Full Name	Mrs Margaret Warman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	It is not clear where the Guiding Development policies are.
Included files	
Title	Question: Any other comment
ID	EGS12274

Person ID	1264925
Full Name	sharon warner
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>ave lived in Hemel Hempstead since my father came out to Hemel with the Co op to the New Town. Having lived in Hemel since I was 18 months old,. I had a wonderful childhood in the local areas, but I am afraid the planners have let us down. In our teenage years we all loved The Marlowes with The Wimpey bar and several Coffee bars, and the special place in the town was The Paviliion were such a lot plings went on from bands, boxing matches, dinner dances and disco nights something for most people.</p> <p>This was demolished and we were promised a better replacement, which never materialised. The town was never the same after the marlowes was pedestrionised. Nearly all thet adult/family entertainment venues in this town - the Pavillion, countless pubs that hosted live music as well as social clubs, nightclubs, bars, arcades, swimming centres, bowling and many others. To compound this, the population has grown significantly already and the residents are feeling it. The youth all congriate around shops as there is nowhere for them that they feel theycan belong too.</p> <p>Not planning to provide social activities for residents is highly detrimental to people's mental, physical and social health. Planning to increase the population of the borough by an additional 50,000+ people without planning for these improvements will compound this issue even further.</p> <p>Residents need to be provided with a wide variety of options for things to do. There's only so many times you can go for a meal and head to the cinema.</p> <p>High streets should no longer be focused purely on shopping, which is being driven out by online shopping, and instead should offer a range of entertainment venues for residents. This will provide jobs and bring high streets to life. Entertainment venues should be suitably sized. The Old Town Hall has a capacity of around 100 people. This is not suitable to cater for a growing town which will soon have a population to rival cities. Entertainment venues can cater for local groups such as amateur dramatics, local music festivals, open mic nights and then have the potential to draw in larger acts in terms of comedians, musicians and bands, theatre productions, etc.</p>

Growth is not compatible with sustainability. Simple but very true.

Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced.

Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.

Included files

Title Question: Any other comment

ID EGS12282

Person ID 1264925

Full Name sharon warner

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment Additionally, some people that I know received a leaflet through the door regarding the local plan. However I only found out about this after speaking to my friend at our allotment, even though we had taken part in the original meetings regarding The Local plan. So how many people who this will effect not had a chance to give their views, after all they will have to live in this area. - it is suggested this is picked up with your distribution company!

Included files

Title Question: Any other comment

ID EGS12292

Person ID 1269485

Full Name NICOLA HULSE

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS12306
Person ID	1269488
Full Name	SAMANTHA SMITH
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Berkhamsted already has a congestion problem, increasing homes will exacerbate the problem further.
Included files	
Title	Question: Any other comment
ID	EGS12341
Person ID	1269490
Full Name	MIKE WHIT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The council have carried out a sham of a consultation, of massive importance for the people of Northchurch, where there are many, many elderly people living. You are well aware that these people do not have use of the internet or email – I know that for a fact, and you have not enabled them to consult with you, and frankly the legality of this should be looked into. You cannot possibly claim you have carried out a proper consultation. You have deliberately excluded people who care about Northchurch. If you had taken the time to canvass local residents by having meetings in a local hall, and boards showing what you want to do, then local elderly people could have been taken to those meetings, and been given forms to sign, yes if you agree, no if you don't. It has been a completely inadequate consultation period, with absolutely no inclusion of a vast number of the local population. The Council should be ashamed. It is riding roughshod over the elderly people who have lived here for many years, and potentially their ancestors for hundreds of years. These are the people who have contributed to the economy of Decorum for years, but you simply do not care about these people.</p> <p>You have launched this so called consultation at a time when people cannot get out of their houses, when parents are up to their eyes homeschooling their children. You have been told by Lara Pringle of the very high number of people</p>

who have not even been aware of these plans. This pandemic has caused so much stress to people, who are trying to work, or even worse, looking for work because they have lost their jobs, and you expect to thrust this massive consultation on people who are already at the full capacity of stress and worry.

Included files

Title Question: Any other comment

ID EGS12348

Person ID 1264637

Full Name Ollie Parrish

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

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surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS12360

Person ID 1269489

Full Name STEVE HILL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

In a letter from the Department of Communities and Local Government, dated June 2016, the then Minister of State for Housing and Planning, Brandon Lewis, states that:
 “..... Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people." I am sure the weight of evidence you will receive to this consultation will prove that you do NOT have the support of local people. In the same letter the Minister states: "We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries". However, it is very clear from this consultation that the proposed Green Belt releases are driven entirely by the requirement to allow the development of more housing across the Borough.

Included files

Title Question: Any other comment

ID EGS12373

Person ID	1269491
Full Name	Mr David Eeley
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS12377
Person ID	1269492

Full Name	Mrs Isabelle Gorton
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p> <p>The Economy has changed dramatically since the Pandemic and this should be reflected in a reassessment of the Plan to develop Green Belt land.</p>

Included files	
Title	Question: Any other comment
ID	EGS12407
Person ID	1269497
Full Name	MICHAEL RUDIN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not adequate. The plan requires substantial additional assessment to supplement the reconsideration of the evidence available; there should be more detailed assessment of housing supply requirements and the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a duty to cooperate. A substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>There should be a reversion back to a strategy where Hemel Hempstead takes on the vast majority of housing need, given the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>

The fundamental aim of the Green Belt policy is to contain urban sprawl by keeping land permanently open; essential characteristics of Green Belts are their openness and permanence. The council's plan would shatter the Green Belt in this area of Tring destroying the openness and permanence of the beautiful countryside. Once destroyed it cannot be restored. There are alternatives that should be considered.

I also think that the consultation should be delayed because it is impossible to canvass opinion during a global pandemic. It is not a proper and fair consultation.

Included files**Title** Question: Any other comment**ID** EGS12409**Person ID** 1269499**Full Name** Mrs Penny Kent**Organisation Details****Agent ID****Agent Full Name****Agent Organisation****Yes / No** Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Since Covid everything has changed and there should be further consultation. The consultation was inadequate and it seems the Council are rushing through decisions without proper debate and discussion with the local residents.**Included files****Title** Question: Any other comment**ID** EGS12424**Person ID** 1269503**Full Name** Mr Jan Wosiek**Organisation Details****Agent ID****Agent Full Name**

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>1: I received a copy of brochure promoting The Local Plan 'Emerging Strategy for Growth Consultation' on 23rd February, but only after my wife had registered a complaint.</p> <p>This document provided links to the main document for review, however due to its size, only cursory comments have been made.</p> <p>2: The methods required to respond to this plan are somewhat discriminatory to some within the community who do not have access to IT.</p> <p>Additionally those that are not IT literate will find it nigh on impossible to respond to this plan, particularly if they learn about it at a late stage as we had.</p> <p>3: It is evident from what I have reviewed, DBC have not assessed the cumulative negative impact on existing residents regarding the environment or their quality of life.</p>
Included files	
Title	Question: Any other comment
ID	EGS12475
Person ID	629143
Full Name	Mr Chris Briggs
Organisation Details	Spatial Planning Manager St Albans City & District Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>9. Continued Collaborative Working</p> <p>We are happy to confirm that SADC is committed on ongoing discussion and continued collaboration with regard to these matters. This includes at the next Portfolio Holder DtC discussion that we have recently agreed to happen this summer, following the recent such meeting. As part of this, we will continue to keep you updated on our own Local Plan progress.</p>

We trust that the comments above will be of assistance as you continue with your work on your Plan and with our joint work on the South West Herts Joint Strategic Plan. We are very happy to discuss further, as appropriate.

Included files

Title Question: Any other comment

ID EGS12503

Person ID 1269525

Full Name QUENTIN HALFYARD

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

This is a comment I want to relay to you from a town resident, who posted this on the nextdoor.com website just now. My reason for re-posting it here is because I agree with her about the lack of appropriate means by which to engage people in these important decisions. Whatever is being done currently isn't working and needs to be re-considered.

"Whilst I think that a number of you who have bothered to join a site like this would have an interest and care about your neighbourhood...I would be surprised if many other people would have taken the time to complete it. Not that people wouldn't have wanted to but.... !! I have to admit ...I am exhausted and if you have spent your working life in a practical role then one may not be used to long, very long and "wordy" reports and papers !! I could just about make out the language used for such a strategic programme of growth. I wonder how many "everyday people" who really do care about there community would read it and complete it (it has taken me 5 hours) and it would appear that not many even knew about it.

(My cynical side would probably comment but I will not..i'm too tired !!)

However one proposal close to home was a proposal to build 30 news homes on the Smith coffee site in Ebberns road !!! OMG if that road is not hard enough to get down and lack of parking. The parking allocation for new developments (yet another paper you had to read) does not provide, in my opinion, adequate parking allocation, so the existing residents of Ebberns road, most of whom live in Pre war cottages, so no driveways and very limited parking now, Congratulations there is a proposals of 30 new homes !!! Me thinks a petition is in the pipe line --it needs a residents Carpark not more flats in a AQMA's zone (breaching pollution levels) and 30 extra cars trying to get down the road and sit in the congested

Durrents Hill Road due to one lane traffic lights ...who decided that was a good idea...I think that needs to change too...or am i just being a very moany minnie today ? I dont want to be ..I know we have to see a future growth, but I wish they could make it so the people of the town who have to live here, really do get a say and don't make it so difficult - and then go ahead with decisions that really negatively impact on the well being of peoples lives...Thank you dear neighbours for bearing with me while I let off steam !!! hope you all had a lovely weekend ..Sunshine yeahhhhhh!!!!"

Included files

Title Question: Any other comment

ID EGS12515

Person ID 1269527

Full Name JULIAN SMITH

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

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***** ADDITIONAL COMMENT: *****

It is not just and right that landowners – some who have strategically purchased farmland with a view to a ridiculous financial windfall as Green Belt is destroyed – build on every square foot of land that was the Green Belt, a national treasure that isn't supposed to be built on. Why should the community lose everything and the land owner gain everything in the destruction of Green Belt and our community's environment?

This process should not be considered a case of "winner takes all" - that in the event decision to build housing surrounding Tring in Green Belt, then it's just tough luck, Tring lost and loses its rights to the beautiful Green Belt environment and fine small community we had.

I would propose that, in the event of housing being forced upon us, then new housing should not be right in the faces of existing roads and houses, but more sympathetically and tastefully buffered by being placed behind wooded areas of trees – perhaps at least 30m deep. This would create a far better environment and be fairer to those who either live close to or directly facing Green Belt that is being corrupted. Yes, this would enable a lower density of new housing and smaller landowner windfall, but it would be far more reasonable and appropriate to the situation and create far less of a feeling of urban sprawl that we all dread.

Included files

Title Question: Any other comment

ID EGS12525

Person ID 1207806

Full Name Mr Chris Graebe

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The Council seems to take the view that national needs for housing happen to be identical to our local needs. This could not be further from the truth. Our local needs in Berkhamsted are being met, at only half the level of building that is now proposed, and the statistics have had to be grossly distorted to produce the 922 figure. Dumping such an excessive level of housing on the Berkhamsted area cannot be excused by any pretence that it is needed.
Included files	
Title	Question: Any other comment
ID	EGS12532
Person ID	1269212
Full Name	PETER SCOTT
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	1. Further to this response in support of the Local labour party submission on the response to the local plan I'd like to add my support to the BerkhamstednCitizens response whereit adds to comments on the green belt and wehere the tw responses do not conflict then the Labour response is my preferred view. I have attached the Berkhamsted Citizens reponse for reference.
Included files	Berkhamsted Citizens Assoc - RESPONSE - Reduced file size.pdf
Title	Question: Any other comment
ID	EGS12538
Person ID	1269544

Full Name	Ms Lindy Foster Weinreb
Organisation Details	Chairman Berkhamstead Citizens Association
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS12579
Person ID	1261562
Full Name	Sally Symington
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	The recreational pressure and atmospheric pollution from vehicles on A41 are noted as issues with regards maintaining protection of the Chilterns Beechwoods Special Areas of Conservation.
Included files	
Title	Question: Any other comment
ID	EGS12599

Person ID	1269561
Full Name	Mr & Mrs Martin & Tracey Martin & Tracey Read
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> • I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown • I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard • Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt • Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home schooling children as well a dealing with the challenges of CV19 and lockdown • The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation • There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing • The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT

- It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown
- People expect consultations to involve public meetings where officers can explain what is proposed and answer questions
- Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, *"reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law"*.

Included files

Title Question: Any other comment

ID EGS12673

Person ID 1269581

Full Name Vistry Homes

Organisation Details Vistry Homes

Agent ID 979742

Agent Full Name Mr
Robert
Love

Agent Organisation Senior Planning Associate
BIDWELLS

Yes / No
* Yes
* No

QUESTION ANY OTHER COMMENT comment

Our client has interest in land at Land off Pea Lane, Northchurch, Berkhamsted, Hertfordshire ("the site"), which our client continues to promote as a potential residential allocation in the Dacorum Local Plan (2020- 2038).
Representations have been made by our client (under the name of Linden Homes, now part of Vistry Group, following a merger in January 2020) to previous stages of the preparation of the Dacorum Local Plan (2020-2038) including the Issues & Options consultation and Call for Sites held in 2017.
We have set out in this letter the context of our client's representation to the Emerging Strategy for Growth consultation.

Vistry Homes Ltd object to the Emerging Strategy for Growth of the Dacorum Local Plan (2020-2038) as currently drafted for reasons set out below in this letter. Our client has significant concerns with the approach to establishing the housing requirement in the Local Plan and the implication for housing land supply.

Our client also has significant concerns relating to the lack of site assessment as part of the Council's site assessment for housing allocations and we object to the Council's conclusion that the site is considered unsuitable for further consideration for proposed residential allocation, based on the Council's justification that the site is located wholly within the AONB (Area of Outstanding Natural Beauty).

Included files

Title Question: Any other comment

ID EGS12691

Person ID 1269544

Full Name Ms Lindy Foster Weinreb

Organisation Details Chairman
Berkhamstead Citizens Association

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Berkhamsted Citizens Association is committed to the conservation of the historic built environment of Berkhamsted. This includes Northchurch, its internal green spaces and the retention of the surrounding and integral Green Belt which protects them.

Green Belt is the single most important buffer against the coalescence of settlements, the erosion of which will threaten Berkhamsted's distinctive and discrete nature if this Plan is adopted as it stands.

We have been working with the '**ONE VOICE**' ALLIANCE and together we make the following statement ...

ONE VOICE ALLIANCE

- 1 ***Whilst the policy on biodiversity is clear, the emerging plan is not explicit enough in terms of how Dacorum Council will work with developers and other stakeholders to mitigate Green Belt loss, increase biodiversity and meet National and Hertfordshire's goals for climate change and carbon reduction***

1 ***A higher proportion of the houses should be built on brownfield land, or established through conversions, in the existing urban areas of Hemel Hempstead, Tring, Berkhamsted and Kings Langley, and away from areas located in the Green Belt (which should only be used in exceptional circumstances) and the Chilterns AONB and its setting.***

Included files

Title Question: Any other comment

ID EGS12699

Person ID 1269597

Full Name Ms STEPHANIE HOWE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I have made most of my points and how I feel about the plan, but I would like to say that I found actually objecting to it was almost beyond me and probably most people I know. We do not have degrees in finding our way round impenetrable planning documents!
Also we were informed that a summary of the plan would be sent out to all Dacorum residents I have not received mine and nor has anyone that I know.

Included files

Title Question: Any other comment

ID EGS12717

Person ID 1269600

Full Name Alex Marsh

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> • I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown • I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard • Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt • Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown • The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation • There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing • The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT • It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown • People expect consultations to involve public meetings where officers can explain what is proposed and answer questions • Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, <i>"reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law"</i>.
Included files	
Title	Question: Any other comment
ID	EGS12720
Person ID	1269602
Full Name	Mr Robert Newton

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Overall the plan is unambitious, unimaginative and outdated, it does not offer any distinctive vision for Tring. As it stands it will completely change the character of the town for the worse and result in the loss of highly valued wildlife and greenspace.</p> <p>The proposed increase in housing numbers (over 2700) are not justifiable for Tring. Numerous local groups have produced evidence on required housing numbers which should be used to push back on the government. Dacorum should be fighting to protect the things which make it so special, it's countryside and historic towns, instead of readily giving it all up to developers.</p> <p>Development on the Green Belt should be an absolute last resort. If development is to happen the plan needs to be much more ambitious and determined in protecting and enhancing remaining areas and mitigating the impact on those areas which area developed.</p> <p>I would like to also add a general objection to the timing and way in which this consultation has been carried out in relation to the Covid pandemic. I appreciate these are difficult times but I feel strongly that the council should have postponed the consultation until restrictions were eased to enable face to face consultation events, physical displays for people to visit and to ensure people have the time and headspace to address such an important issue.</p>
Included files	
Title	Question: Any other comment
ID	EGS12739
Person ID	1145958
Full Name	Mr Adrian England
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>This Plan is at once “planning-risk averse” and yet opens boulevards of opportunity for developers to pave. It amounts to a belt and braces approach to the downside – give up the greenbelt to the builder, and brace yourself for the heights, downtown!</p> <p>The consultation has failed because of the Covid lockdown. A reasonable benchmark for a consultation this important and far-reaching must be 20% of the adult population; this would be 25,000.</p> <p>This consultation is a step in the production of Dacorum’s “Local Plan”, but it has been presented as the “Emerging Strategy for Growth (ESfG). It appears obvious that many, many residents are essentially both reasoning as averse and in some cases flatly averse to growth, especially if it affects their personal situation and micro-location. This is understandable and while flat rejection of growth is not helpful, reasoned opposition must be examined and in many cases I believe it should be proactively presented by the Plan, with caveats and consequences when it is re-consulted at regulation 18.</p> <p>The pandemic-constrained engagement with non-digital-using residents, combined with the change of numbers from the Government, and the sheer unsustainability of these numbers, given the Climate Emergency mean that a new regulation 18 consultation will be necessary, for the Plan to achieve support or acceptance from residents.</p> <p>Indeed this regulation 18 consultation would have benefitted residents by setting out, in greater detail, the quality of all candidate sites, scored (with a score able to be varied by consultees) according to accessibility, and quantified value or cost to health, wellbeing and cohesion.</p> <p>Objectively Assessed Need</p> <p>The National Planning Policy Framework requires that all planning authorities prepare Local Plans to provide housing which meets their objectively assessed need.</p> <p>1 <i>Plans and decisions should apply a presumption in favour of sustainable development.</i></p> <p>For plan-making this means that:</p> <p>(a) <i>plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;</i></p> <p>(b) <i>strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas 5 , unless:</i></p> <p>(i) <i>the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area 6 ; or</i></p>

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

NPPF section 11

Section 60 of the NPPF suggests that the housing need is set by the standard method. However, the housing figure from the standard method for Dacorum has changed during the course of this consultation.

- 1 *To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.*

NPPF section 60

In November 2020 Dacorum had a standard method 'housing target' of 922 dwellings per annum. This was based on the most recent Office for National Statistics ('ONS') housing need projections, (355 per year averaged over the next ten years for Dacorum) and uplifted by an algorithm which placed import, not only on housing affordability, but also on the change in housing affordability in the last ten years. This resulted in a multiplier applied to the ONS projected need of 2.6, and overall housing target of 922 dwellings per annum.

In December 2020, Government announced that it would no longer be using this method to calculate the housing target and that it would revert to an earlier affordability algorithm. This algorithm limited the uplift from ONS figures to 1.4 x ONS figures. With the latest ONS figures suggesting that Dacorum would need 355 dwellings per year this would provide a housing need figure of around 500 dwellings per annum. However, rather than use the latest projections, Government announced that it would instead revert to the 2014 projections.

'We will continue to use the 2014-based household projections. The government has carefully considered whether to use the 2018-based household projections and has concluded that, due to the substantial change in the distribution of housing need that would arise as a result, in the interests of stability for local planning and for local communities, it will continue to expect only the use of the 2014-based projections.'

Government response to the local housing need proposals in 'Changes to the current planning system'

As the latest housing need projections for Dacorum are around half the 2014 ones (355 vs 730)

using out of date 2014 projections results in a 'housing target' figure for Dacorum of 1023 dwellings per annum. It is specifically stated that the reason for using the old projections is because there is a 'substantial change' between the old projections and the most recent ones.

Therefore, it is self-evident that the housing target produced by the standard method cannot be accurately described as an objectively assessed need.

We urge the Council to request of Government, that the best information available be used to calculate our housing target. That is, the most recent ONS figures, and the standard method (which limits uplift to a multiplier of 1.4).

If Government does not agree to alter the Standard Method across the country to reflect more recent trends, the NPPF section 60 allows for planning authorities to set their own housing need under ‘exceptional circumstances’.

It is my view that the fact that the target figure set by using the 2014 projections is not in any way an ‘objectively assessed need’, combined with the fact that providing for over double the actual required need would fundamentally fly against the UKs 2050 net zero commitment, provides this exceptional circumstance to apply an alternative approach to calculating the housing need.

It is my considered view that as such, DBC should use the latest housing projections, along with the original standard method to calculate its housing need, and update this local plan to provide for a 9,000 homes over 18 years.

It is worth noting that the reasons given by MHCLG for rejecting the complex housing algorithm (which for Dacorum gave a target figure of 2.6 x the ONS projected housing need) focused on the pressure on rural areas and Green belt.

‘In particular, we heard that too much strain was being put on our rural areas and not enough focus was on the renewal of our towns and cities.’

‘in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.’

Government response to the local housing need proposals in ‘Changes to the current planning system’

In the emerging local plan, which uses the figure of 922 dwellings per year, it is proposed that over 750 hectares of Green belt be released and allocated for housing. If the figure of 1023 dwellings per year were used, it can only be assumed that pressure on green belt would be even greater. Great import is attached to preserving Greenbelt in the NPPF.

- 1 *The Government attaches great importance to Green Belts. 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 their permanence.*

NPPF section 133

It is also clear from the NPPF that the release of green belt can only be considered in ‘exceptional circumstances’.

- 1 *Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.*

NPPF Section 136

We consider that meeting a housing target which cannot be accurately described as an ‘objectively assessed need’ does not qualify as an ‘exceptional circumstance’ in which Green belt may be released.

Furthermore, even where exceptional circumstances apply, green belt may only be released as a last resort.

1 *Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

a) makes as much use as possible of suitable brownfield sites and under utilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

NPPF Section 137

We do not consider that all other options for housing have been appropriately considered in this local plan. For example, the windfall figure which is provided for in this plan is 133.8 per year. In the last fourteen years the windfall figure has been 306.2 per year on average (346 per year over the last five years). The figure for this plan period is therefore far lower than could be reasonably expected. However, permitted development rules have been widened significantly, and now include the potential to increase the height of buildings, adding flats on top of blocks of flats and adding flats on top of shops. This will likely mean that windfall figures will if anything, increase. On top of this, the pandemic is expected to cause a shift away from office space for businesses in favour of more flexible working practices and this is likely to free up more brown field space within towns all over the country, thereby taking pressure off green field and green belt sites.

According to the NPPF:

1 *Green Belt serves five purposes:*

a) to check the unrestricted sprawl of large built-up areas;

b) to prevent neighbouring towns merging into one another;

c) to assist in safeguarding the countryside from encroachment;

d) to preserve the setting and special character of historic towns; and

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Section 134

Releasing the amount of Green belt proposed, is likely to prevent essential renewal of our town centres post pandemic.

Social housing need in Dacorum

Planning authorities are expected to meet their needs for different types of housing, not only the headline figure for number of dwellings.

- 1 *Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).*

NPPF Section 61

There are currently over 7000 people on the housing list in Dacorum. That is over 7000 people who meet the criteria for council or housing authority housing and who have asked for it. This need is not being met adequately through this plan. The Local Housing Needs Assessment ('LHNA') for South West Herts estimated that the number of affordable houses needed per year in Dacorum is 363 and that 87% of these should be social housing. Whilst this figure may also be impacted to a certain extent by the expected decrease in growth which has caused the ONS projections for our area to reduce from 730 to 355 dwellings per year, the current need is still large.

It is our view that the Local Plan does not include sufficient allocations for affordable, or in particular social housing for the needs of Dacorum residents. Of the 922 dwellings proposed per year only 70 per year are expected to be social housing, as compared to the need for 315 social dwellings per year from the LHNA. We would like to see a third of housing delivered in Dacorum be social rented housing. A large proportion of the housing envisioned in this plan will not be affordable for our residents, but is rather aimed at London commuters, and this will do nothing to improve the affordability of housing in Dacorum.

Included files

Title Question: Any other comment

ID EGS12758

Person ID 1269618

Full Name Alistair Heath

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment [PERSONAL DETAILS REMOVED]

I have lived in Berkhamsted for as long as I can remember, playing an active role in the community. Having studied the proposals for the local plan, I would like to comment on the nature of the consultation and details of the plan itself.

Firstly, given the significant impact the plan will have for generations I am surprised that the consultation has been held over the Christmas period and a winter where due to the pandemic we have been required to stay inside. For many, particularly the elderly members of our community this has made finding out about the plans very challenging and many are still unaware.

Additionally, many of the online resources seem incorrect. The cemetery near the Rex Cinema and one campus of the Berkhamsted school are considered open-space in the maps. Whilst this may or may not be true from a legal perspective, neither would be a suitable location for a run or picnic (whenever the latter is a viable option again). It seems to me that much of the material and campaign has been designed in an unfortunate nature.

Included files

Title Question: Any other comment

ID EGS12773

Person ID 1269624

Full Name David Burne

Organisation Details Redington Capital

Agent ID 1269623

Agent Full Name Mark
Harris

Agent Organisation Associate
Bidwells LLP

Yes / No
* Yes
* No

QUESTION ANY OTHER COMMENT comment

We have identified that there is a clear need for the Council to amend the housing target in the Local Plan and to identify additional land, over and above that already identified, to meet the minimum housing need of the area.

We have also identified that the employment policies of the draft Local Plan do not accord with the intention of national policy and, that through their review, there is an opportunity to provide the flexibility to stimulate investment whilst also supporting the need to deliver increased rates of house building in the area and facilitate the efficient use of brownfield land. Without these changes, Redington Capital consider that the Local Plan is unsound.

We hope these comments are helpful in helping the Council develop the Local Plan ahead of a pre- submission consultation later in the year. If you do have any queries, please do not hesitate to contact me to discuss.

Included files

Title	Question: Any other comment
ID	EGS12775
Person ID	1269627
Full Name	Mr Peter Macmaster
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The proposed, continuing encroachment on Green Belt land - an irreversible process - should be viewed as a last resort, not an easy option. The imposed housing targets can and should be challenged on the grounds of the negative impact on the environment and their non-sustainable nature.</p> <p>In respect of Berkhamsted the inevitable increase in traffic, and its accompanying pollutants, is a threat to public health and to road safety, particularly for school-children and the elderly. As a dormitory town it already sees increased traffic flows into and away from the railway station - competing with schools traffic in the mornings - and this can but increase pari passu with new housing: there are no employment opportunities of any scale within the town.</p> <p>There is a more general point to be made in regard to the Local Plan document: since it was drafted the Covid pandemic has caused massive economic and social upheaval across the whole country. The retail and hospitality sectors are among the hardest hit and it is unclear how town centres including ours will be affected in either the immediate or the longer term. In this climate of uncertainty it is less than sensible to attempt to set in place a detailed Growth Strategy spanning the next two decades.</p>
Included files	
Title	Question: Any other comment
ID	EGS12782
Person ID	1269630
Full Name	Christopher Lyne

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>These are extremely important future plans for our Borough. But you are holding this consultation at a time when the population are all locked down and completely distracted on the tough task of just keeping their family's life on the road. It is asking an awful lot of people at such a moment to study the huge number of documents involved, in order to make a meaningful response. The end of the lockdown is hopefully in sight, so it is hard to understand why you cannot delay or extend for a few weeks, in the near certainty of getting a much higher quality response from the public. The fact that you are unwilling to do so will confirm many peoples view that this is a box ticking exercise, rather than a genuine consultation.</p> <p>Your internet portal in use for this consultation is a real mess. Even the very experienced and IT savvy have great difficulty navigating it and it has single-handedly raised the average blood pressure of those responding in the Borough. Surely you can do a lot better?</p>
Included files	
Title	Question: Any other comment
ID	EGS12787
Person ID	1269628
Full Name	Steven Bragg
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing

supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files	
Title	Question: Any other comment
ID	EGS12795
Person ID	1269630
Full Name	Christopher Lyne
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	

QUESTION ANY OTHER COMMENT comment	<p>It can be a challenge to love some of the New Town architecture that Hemel is blessed with. But this is mitigated by the abundance of open green space all around us. The general thrust of the Plan seems to disregard this important factor. It is bad enough having shops closing and being boarded up all over the place without making the aesthetics around the town even worse still.</p> <p>The National Planning Policy Framework, section 13, paragraph 136 states very clearly that Green Belt boundaries should be altered only where exceptional circumstances are fully evidenced and justified. Given the other options available, it is open to considerable doubt as to whether the Council has met this stipulation in its plans to encroach on the Green Belt in this Plan.</p>
Included files	
Title	Question: Any other comment
ID	EGS12824
Person ID	1269634
Full Name	Frank Worth
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>— I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>— I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard</p> <p>— Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.</p> <p>— Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home-schooling children as well a dealing with the challenges of CV19 and lockdown</p>

- The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation
- There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing
- The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT
- It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown
- People expect consultations to involve public meetings where officers can explain what is proposed and answer questions
- Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

Included files

Title Question: Any other comment

ID EGS12825

Person ID 1144631

Full Name Mrs Ann Johnson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment I have tried to register for the portal but despite two attempts no confirmation email has been received.

Included files

Title Question: Any other comment

ID EGS12838

Person ID	1269646
Full Name	Colin McHugh
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Please DO consider all objections!
Included files	
Title	Question: Any other comment
ID	EGS12851
Person ID	1145801
Full Name	Mr Guy Barlow
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am very concerned that amongst the wider Dacorum community there is a general lack of knowledge about the local plan and more importantly that the consultation period for it is about to close and as such people have missed the chance to comment on their future. I only received information of the plan through the post yesterday (25th February 2021) and this is not a reasonable time period to properly review the proposals.</p> <p>Due to Covid restrictions it has not be possible to engage and inform people with events such as:</p> <ul style="list-style-type: none"> • Door to Door canvassing of the local plan consultation

- Interested parties to meet and canvas at the various town markets Covid restrictions have impacted
- Our ability to attend Council Meetings in person rather relying on access to online forums
- Residents being able to meet and consider responses to the local plan

The Government has asked all of us to restrict our interactions with the general public as it is both irresponsible and unlawful to do otherwise.

In short it feels as though the council is trying to push through this consultation period without actually consulting properly with the local residents and giving local residents the suitable platforms to obtain the required information and to consult on this matter. This has been disappointing.

I feel the strategy has failed to take account of a number of important issues or has diminished their significance, most importantly - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs. The pursuit of economic growth should be balanced against and not override environmental concerns and climate obligations.

Included files

Title Question: Any other comment

ID EGS12867

Person ID 1269661

Full Name Ray Guirguis

Organisation Details OSD Healthcare

Agent ID 1269662

Agent Full Name Nick
Baker

Agent Organisation Planning Director
Lichfields

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment *Glossary*

The definition of a General Employment Area should be updated to take into consideration the recent amendments to the Use Classes Order. The definition should also reflect the wider range of acceptable employment uses which are supported by draft Policy DM16.

Conclusions

We trust that these representations will assist in the preparation of the emerging Local Plan. Please do not hesitate to contact Nick Baker or Amy Lomath in our London office should you wish to discuss these representations or require clarification on any of the points made.

OSD reserves its right to appear at any future Local Plan Examination in support of these representations.

We should be grateful if you would continue to keep us informed of progress on the development of the emerging Local Plan.

Included files

Title Question: Any other comment

ID EGS12903

Person ID 1269665

Full Name Mr Martin Hicks

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Whilst there are laudable objectives, the opan is currently not sustanianble for the reasons outlined.

Included files

Title Question: Any other comment

ID EGS12920

Person ID 1207443

Full Name Mrs Jennifer Bissmire

Organisation Details Clerk

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The quality of the maps is appalling, with details of sites impossible to read in very many instances.</p> <p>The Plan is very complicated and asks questions of summarised policies followed by questions on the same policies in detail.</p> <p>Replying to the consultation has been made very difficult. The time available for comments had to be extended given that the Plan was published close to Christmas and not long before the latest Covid lockdown. Consultation with parishioners has been very difficult for Councillors, who themselves can only meet by Zoom.</p> <p>The document circulated in early February was not very helpful as it did not include the questions which are to be responded to and did not give adequate information for them to be located on the DBC web site.</p>
Included files	
Title	Question: Any other comment
ID	EGS12933
Person ID	1269677
Full Name	CAROLINE CLIST
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	needs to be greater recognition on the role of rural areas (whether in the green belt or elsewhere) in delivering some of the sustainability targets. Rural areas could provide better air quality, green power, increased biodiversity and carbon neutral food production.

The plan will operate in the 'post-Covid' world and will need to have cognisance that land usage has changed and this is a great opportunity to re-think the way things are to provide for all people prosperity (social foundation), whilst living within the raw resources available (ecological ceiling).

Included files**Title** Question: Any other comment**ID** EGS12946**Person ID** 1269678**Full Name** GARY TRENT**Organisation Details****Agent ID****Agent Full Name****Agent Organisation****Yes / No** Yes
* Yes
* No**QUESTION ANY OTHER COMMENT comment**

The strategy is fundamentally flawed, and therefore the plan is flawed. It is not what the country, or Dacorum, actually needs.

I was only made aware of this consultation late today so to go through detail is unrealistic. Every household should have been notified of the consultation. Residents can't respond to something we don't get notified is happening! Given the implications of this plan, the Councils approach to the consultation is unreasonable.

Included files**Title** Question: Any other comment**ID** EGS12947**Person ID** 1145984**Full Name** mr michael hicks**Organisation Details****Agent ID**

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>To uphold democracy the consultation period should be extended to allow the public to attend real consultation exhibitions. Most people I meet do not know of the consultation or what it is about.</p> <p>Many do not have computers or the time to read the 3 inches thickness of reports. Simplified and short plain english summaries should have been sent out to the public.</p> <p>As a long term resident of Tring I have only commented on Tring.</p> <p>I have not read the plans on other areas and my lack of comments does not mean that I agree with the proposals for other areas.</p> <p>I have many objections to this plan which seems to me to be no more than a list of places where developers want to build profitable houses in sufficient numbers to meet the Governments targets.</p> <p>It is not a plan to enhance the well-being of the existing and future residents nor does it meet the SA Frameworks objectives listed in your Sustainability Appraisal Report.</p> <p>The proposals are for too many houses in one release.</p> <p>They use all the available space for future developments.</p> <p>None is set aside as safeguarded land for future developments.</p> <p>The special character of Tring would be destroyed by the building of so many houses in such a short time.</p>
Included files	
Title	Question: Any other comment
ID	EGS12966
Person ID	1264971
Full Name	Louise Watson
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Please let me know if you cannot read this document, as I had trouble with the embedded fonts being recognised and had to download an Adobe Acrobat font set, otherwise the pages looked blank.
Included files	
Title	Question: Any other comment
ID	EGS12971
Person ID	1264971
Full Name	Louise Watson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS12980
Person ID	1264971
Full Name	Louise Watson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>We moved to Northchurch 15 years ago with a 6-month year old son in order to escape the built-up streets of North London. Please note that I call the area we live in Northchurch, not West Berkhamsted as it is incorrectly called in the Local Plan consultation. Northchurch is a village separate from Berkhamsted with its own character, and I love every thing about our community: the people, the canal, the rare chalk stream the Bulborne, the plentiful trees and green spaces. Best of all is having Ashridge nearby and the views of green everywhere you look from the Common (and even green fields that I can see from my loft bedroom). I've never regretted moving to this beautiful valley.</p> <p>You can imagine how disappointed and disgusted I was to hear about the details of the proposed Local Plan, which will ruin everything that is beautiful about Northchurch by over-building on our precious green belt.</p> <p>I am particularly concerned with the effect that the proposed plan will have on the ancient woodland especially in Shooters Lane, and how the hedgerows will be managed, which are vital for biodiversity (and need a 10m zone around them to work effectively as a habitat. These wildlife corridors are vital to creatues in our area.</p> <p>I'm also worried that my husband who commutes to London will struggle to get on a train due to the vastly increased population of Northchurch and Berkhamsted that this plan will cause.</p> <p>I am also very concerned about hwo this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown</p> <p>I am concerned that many residents simply did not know this was going on – publicity was poorly planned and haphazard Of the small proportion of residents who did get the brochure – many believed they had no way of responding – it was not clear that postal responses were possible as the literature only referred to using the portal or email – those without IT felt excluded.</p> <p>Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during locakdown – they were busy with working-from-home whilst home-schooling children as well as a dealing with the challenges of CV19 and lockdown</p> <p>The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation</p>

There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing

The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT

It was not possible for councillors or their teams to knock on doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown

People expect consultations to involve public meetings where officers can explain what is proposed and answer questions

Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, “reflect the considerable effect Covid-19 has had on areas such as shopping habitats and town centres as well as changes to planning law”.

Included files

Title Question: Any other comment

ID EGS12995

Person ID 1059698

Full Name Mr Richard Lyne

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment These are enormously important future plans for our Borough. But you are holding this consultation at a time when the population are all locked down and completely distracted on the tough task of just keeping their family’s life on the road. It is asking an awful lot of people at such a moment to study the huge number of documents involved, in order to make a meaningful response. The end of the lockdown is hopefully in sight, so it is hard to understand why you cannot delay or extend for a few weeks, in the near certainty of getting a much higher quality response from the public. The fact that you are unwilling to do so will confirm many people in the view that this is a box ticking exercise, rather than a genuine consultation.

Your internet portal in use for this consultation is a real dog's breakfast. Even the very experienced and IT savvy have great difficulty navigating it and it has single-handedly raised the average blood pressure of those responding in the Borough. Surely you can do a lot better?

Included files

Title Question: Any other comment

ID EGS13003

Person ID 1059698

Full Name Mr Richard Lyne

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

It can be a challenge to love some of the New Town architecture that Hemel is blessed with. But this is mitigated by the abundance of open green space all around us. The general thrust of the Plan seems to disregard this important factor. It is bad enough having shops closing and being boarded up all over the place without making the aesthetics around the town even worse still.

The National Planning Policy Framework, section 13, paragraph 136 states very clearly that Green Belt boundaries should be altered only where exceptional circumstances are fully evidenced and justified. Given the other options available, it is open to considerable doubt as to whether the Council has met this stipulation in its plans to encroach on the Green Belt in this Plan.

Included files

Title Question: Any other comment

ID EGS13012

Person ID 330928

Full Name Mr James Gregory

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>survey is ill timed as the pandemic has frustrated attempts to alert the public to its request for views. It is impossible to have collective discussions and meetings prior to the submission deadline. I am very aware that most people in my area 1/ do not know of its existance 2/ when they have attempted to log on find the portal intimidating, unfriendly or impossible to operate and have given up in frustration. 3/ Are unawaare of the name or contact details of any officer who can guide them in the completion of the forms.</p> <p>Finally I find the plan to be lacking attention to very many important issues especially health, safety and environment and too ready to use green field thinking rather than maximise brown field thinking.</p>
Included files	
Title	Question: Any other comment
ID	EGS13039
Person ID	1270011
Full Name	Mrs Nicola Davis
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I have received no written communication with regards to these plans, and find it disappointing, to say the least, that the consultation has taken place during lockdown; leaving us to try to navigate the over-complicated / convoluted response portal whilst at the same time holding down a full time job and home schooling.</p> <p>We have never received a paper-copy of the proposed plans, but instead have heard about it organically through social media. Since the consultation period began, we have had very little time out of lockdown; so you're expecting residents</p>

to navigate the convoluted portal and get to grips with massive proposals, whilst at the same time having to deal with holding down full time jobs and home schooling children.

You have not allowed the public a chance to debate it openly and discuss it. We've not received any material on it, as mentioned - how many others haven't? There's obviously a lack of door to door canvassing.

It feels like you are pushing proposals through, which apparently you don't support yourselves, hoping that as few of the public engage in as possible. It feels disingenuous, and at the same time it's not environmentally or ethically sustainable.

I wholeheartedly hope these plans are rejected. The strategy has not taken into account, or has reduced the significance, of issues such as the climate emergency, the environmental impact of the proposed development and the prioritisation of brownfield sites.

Included files

Title Question: Any other comment

ID EGS13069

Person ID 865165

Full Name Mrs Rosemarie Hollinghurst

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION ANY OTHER COMMENT comment I am not commenting on the plans in relation to climate change at this stage, nor on any transport provision as there is not sufficient detail in the plan. Nothing has been detailed about transport to the station or the N/S Link road. I expect others will mention the flooding that occurs in and alongside Station Rd by the canal bridge.

Included files

Title Question: Any other comment

ID EGS13077

Person ID	1270019
Full Name	Ms Clare Kirwan
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Reference Long Marston This plan is far too excessive and out of character for the local area. A rural situation which will be extensive altering the area and landscape. Local working farms which have provided and sustained the country during the covid pandemic are to be compulsory purchased therefore reducing the agriculture productivity in this area.
Included files	
Title	Question: Any other comment
ID	EGS13081
Person ID	1262369
Full Name	Abigail Jamison
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I attempted to use the online response process but was thwarted at every point and had to resort to using the response form. Unfortunately, the online process is an overly cumbersome and complex system that it not fit for purpose.

Included files	
Title	Question: Any other comment
ID	EGS13093
Person ID	1264779
Full Name	James Froggatt
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>While this is an overarching plan, it is important to consult extensively with the people who will be the recipients or victims (depending on your point of view) of these new house developments. The existing residents and their children) have a tendency to know what they want and should be given every opportunity to express their opinion on a development by development basis.</p> <p>This is more than the usual planning permission engagement. It is an active survey and encouragement of participation and involvement in the planning of the locals. I have the redevelopment of the Kings Cross area in London in mind here</p>
Included files	
Title	Question: Any other comment
ID	EGS13105
Person ID	1270037
Full Name	MRS GINA BARLOW
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>I am very concerned that amongst the wider Dacorum community there is a general lack of knowledge about the local plan and more importantly that the consultation period for it is about to close and as such people have missed the chance to comment on their future. I only received information of the plan through the post yesterday (25th February 2021) and this is not a reasonable time period to properly review the proposals.</p> <p>Due to Covid restrictions it has not be possible to engage and inform people with events such as:</p> <ul style="list-style-type: none"> - Door to Door canvassing of the local plan consultation - Interested parties to meet and canvas at the various town markets Covid restrictions have impacted - Our ability to attend Council Meetings in person rather relying on access to online forums - Residents being able to meet and consider responses to the local plan <p>The Government has asked all of us to restrict our interactions with the general public as it is both irresponsible and unlawful to do otherwise.</p> <p>In short it feels as though the council is trying to push through this consultation period without actually consulting properly with the local residents and giving local residents the suitable platforms to obtain the required information and to consult on this matter. This has been disappointing.</p> <p>I feel the strategy has failed to take account of a number of important issues or has diminished their significance, most importantly - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs. The pursuit of economic growth should be balanced against and not override environmental concerns and climate obligations.</p>
Included files	
Title	Question: Any other comment
ID	EGS13124
Person ID	1264860
Full Name	Alan Coughtrey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment

I am very concerned that amongst the wider Dacorum community there is a general lack of knowledge about the local plan and more importantly that the consultation period for it is about to close and as such people have missed the chance to comment on their future.

Due to Covid restrictions it has not be possible to engage and inform people with events such as:

- Door to Door canvassing of the local plan consultation
- Interested parties to meet and canvas at the various town markets Covid restrictions have impacted
- Our ability to attend Council Meetings in person rather relying on access to online forums - Residents being able to meet and consider responses to the local plan

The Government has asked all of us to restrict our interactions with the general public as it is both irresponsible and unlawful to do otherwise.

The council should extend this consultation by many more months, until the current crisis is over and an additional subsequent period be provide for the full engagement by all Dacorum residents. I feel the strategy has failed to take account of a number of important issues or has diminished their significance, most importantly - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs. The pursuit of economic growth should be balanced against and not override environmental concerns and climate obligations.

Included files

Title Question: Any other comment

ID EGS13140

Person ID 1270061

Full Name Mrs Coughtrey

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

I am very concerned that amongst the wider Dacorum community there is a general lack of knowledge about the local plan and more importantly that the consultation period for it is about to close and as such people have missed the chance to comment on their future.

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- Door to Door canvassing of the local plan consultation
- Interested parties to meet and canvas at the various town markets Covid restrictions have impacted
- Our ability to attend Council Meetings in person rather relying on access to online forums - Residents being able to meet and consider responses to the local plan

The Government has asked all of us to restrict our interactions with the general public as it is both irresponsible and unlawful to do otherwise.

The council should extend this consultation by many more months, until the current crisis is over and an additional subsequent period be provide for the full engagement by all Dacorum residents. I feel the strategy has failed to take account of a number of important issues or has diminished their significance, most importantly - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs. The pursuit of economic growth should be balanced against and not override environmental concerns and climate obligations.

Included files

Title Question: Any other comment

ID EGS13144

Person ID 1270064

Full Name Mrs Elizabeth Freedman

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

It should be the aim to create smaller developments, utilizing modest parcels of available land and enabling easy absorption of new developments within existing communities. Vast developments of enormous acreage are not sympathetic to any area: a new settlement should not dwarf its near neighbours. An example of harmonious creation of new homes would be the 3 developments recently built or under construction in Wingrave - these provide new housing without destroying or engulfing the existing community.

Included files

Title Question: Any other comment

ID	EGS13154
Person ID	1270066
Full Name	Dr Amanda Cole
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	

Title	Question: Any other comment
ID	EGS13159
Person ID	1270068
Full Name	Ms Francesca Greenoak
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I trust you will take the Tring in Transition response to the proposals seriously and amend the plans to accommodate the best in modern building practice and overall development. It would be good to see Dacorum in the forefront of progressive building and regeneration.
Included files	
Title	Question: Any other comment
ID	EGS13162
Person ID	1270069
Full Name	Patrick Moloney
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I did not receive the Dacorum Local Plan brochure and know that many other residents of both Northchurch and Berkhamsted are in the same position. It feels like the consultation has been pushed through under the radar and in the middle of a nationwide lockdown.

I strongly object to the Local Plan. The Plan involves disparate housing developers involved in numerous separate developments with accountability to the local community and no interest other than making a profit from these opportunities. There is no holistic overview of what housing is needed within the local community and the required infrastructure to support any development.

Included files

Title Question: Any other comment

ID EGS13174

Person ID 1270069

Full Name Patrick Moloney

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment

- I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown
- I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard
- Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.
- Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown

- The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation
- There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing
- The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT
- It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown
- People expect consultations to involve public meetings where officers can explain what is proposed and answer questions
- Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, *"reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law"*.

Included files

Title Question: Any other comment

ID EGS13188

Person ID 1144725

Full Name Mr Philip Anderson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

**QUESTION ANY OTHER
COMMENT comment**

- I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown
- I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard
- Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded.
- Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown
- The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation
- There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing
- The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT
- It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown
- People expect consultations to involve public meetings where officers can explain what is proposed and answer questions
- Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, *"reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law"*.

Included files	
Title	Question: Any other comment
ID	EGS13198
Person ID	1270127
Full Name	Amy Moloney
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> • The policies do not take into account the impact of the Covid The changes in lifestyle necessitated through the move towards home based and remote working, and increased flexibility towards home/work balance have not been properly taken into account. • The plan does not take into account the likely increase in empty retail or office space in town centres as a result of the Covid changes, missing a once in a generation opportunity for change
Included files	
Title	Question: Any other comment
ID	EGS13205
Person ID	1270127
Full Name	Amy Moloney
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	

* No	
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> • I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown • I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard • Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded • Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home- schooling children as well a dealing with the challenges of CV19 and lockdown • The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation • There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing • The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT • It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown • People expect consultations to involve public meetings where officers can explain what is proposed and answer questions • Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, <i>"reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law"</i>.
Included files	
Title	Question: Any other comment
ID	EGS13238
Person ID	1258764
Full Name	Mark Bullard
Organisation Details	Tring Squash Club
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>For Tring Squash club the extra land needed to increase playing capacity is modest. However the Cow Lane site which is home to 5 sports clubs needs much more car parking to meet today's playing demand. Currently approximately 2500 people are involved in the sporting activities at the site. The demand for car parking at the site frequently far exceeds car parking capacity. This leads to dangerous parking on Cow Lane which has resulted in several accident near misses, road rage incidents and the police have been involved. Increased housing in Tring will increase the traffic using Cow Lane, therefore exacerbating the current problems.</p> <p>The provision of new sports facilities should be on land contiguous with the Cow Lane site so that existing infrastructure such as changing rooms, club houses and playing areas can be re-used and new infrastructure provision can augment existing facilities e.g. car parking.</p> <p>It is vital the sports clubs in Tring get the opportunity to engage in the detailed planning process so that new sport provision builds on and integrate effectively with the current facilities.</p>
Included files	
Title	Question: Any other comment
ID	EGS13245
Person ID	1270143
Full Name	Mr Thomas Parsons
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Having lived in this town my entire life I have witnesses the removal and deconstruction of practically all of the best adult/family entertainment venues in this town - the Pavillion, countless pubs that hosted live music as well as social clubs, nightclubs, bars, arcades, swimming centres, bowling, pool halls, Quasar, and many others. To compound this, the population has grown significantly already and the residents are feeling it.</p>

Not planning to provide social activities for residents is highly detrimental to people's mental, physical and social health. Planning to increase the population of the borough by an additional 50,000+ people without planning for these improvements will compound this issue even further. Residents need to be provided with a wide variety of options for things to do. There's only so many times you can go for a meal and head to the cinema.

High streets should no longer be focused purely on shopping, which is being driven out by online shopping, and instead should offer a range of entertainment venues for residents. This will provide jobs and bring high streets to life. Entertainment venues should be suitably sized. The Old Town Hall has a capacity of around 100 people. This is not suitable to cater for a growing town which will soon have a population to rival cities. Entertainment venues can cater for local groups such as amateur dramatics, local music festivals, open mic nights and then have the potential to draw in larger acts in terms of comedians, musicians and bands, theatre productions, etc.

After COVID, people will be craving and valuing these facilities more than ever before.

Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite.

Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced.

Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.

Included files

Title Question: Any other comment

ID EGS13250

Person ID 1270143

Full Name Mr Thomas Parsons

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No	
QUESTION ANY OTHER COMMENT comment	Additionally, some people that I know received a leaflet through the door regarding the local plan. However, an equal amount of people I spoke to did not receive this - it is suggested this is picked up with your distribution company!
Included files	
Title	Question: Any other comment
ID	EGS13289
Person ID	1270157
Full Name	Ms Claire Laing
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape</p>

surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS13296

Person ID 1270179

Full Name Susan Kearney

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION ANY OTHER COMMENT comment I also consider that with the Covid restrictions, releasing information regarding the plans has not reached enough members of the community to have a fair balance of views.

Included files

Title Question: Any other comment

ID EGS13305

Person ID 1261215

Full Name Judith Monteath

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>I have responded to this plan already using the web site which I must say is the least iterative and most complex environment for responding I have ever encountered I do wonder if this is intentional / I HAVE HAD NO RESPONSE TO MY COMMENTS NOT EVEN REGISTERING THAT I HAVE COMMENTED?? In short</p> <p>I DO NOT AGREE WITH THE PLANS AND BELIEVE THE CONSULTATION HAS TAKEN PLACE VIRTUALLY IN SECRET DURING A TIME OF HIGH STRESS WHEN MOST PEOPLE HAD OTHER THINGS TO WORRY ABOUT, NAMLY THEIR JOBS, FAMILIES AND LIVES, SO UNFAIR.</p>
Included files	
Title	Question: Any other comment
ID	EGS13319
Person ID	1270200
Full Name	Mr Richard Harman
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>My comments on the review of the Local Plan are contained within this email. I was unable to upload them on the website as it was far too time consuming. I work a very demanding full time job and am home-schooling 3 children. This is an absurd time to do a public consultation when people are totally distracted with managing to work and home schooling children whilst there is a pandemic. There have been no public events held to properly inform local residents of the plan which is crucial when there are such momentous changes proposed for Dacorum.</p>
Included files	
Title	Question: Any other comment
ID	EGS13347
Person ID	1270207
Full Name	Ms Helena Thorpe Foulsham

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Having moved to this town some 10+ years ago I have been witnesses to the removal and deconstruction of practically all of the best adult/family entertainment venues in this town - the Pavillion, countless pubs that hosted live music as well as social clubs, nightclubs, bars, arcades, swimming centres, bowling, pool halls, Quasar, and many others. To add to this, the population within Hemel and the surrounding areas has significantly grown and the residents are feeling the strain especially with the closure of the local amenities and leisure facilities.</p> <p>Where in this plan are the additional social amenities/ leisure facilities. health and mental wellbeing go hand in hand, are these new residents supposed to be cooped up in their new houses with no means of entertainment. A volatile situation and not ideal for mental, physical and social health .</p> <p>The local town is already on a downward slope with many units closing due to the high rents and more shopping going online - this heightened by the COVID epidemic. Whilst there are a few options to offer entertainment facilities, there is not a venue which would cater for the 50,000 extra people expected to be housed in this new development.</p> <p>With COVID subsiding, these facilities will be scouted by people yearning to vist these attractions more than ever</p> <p>The anticipated growth is clearly not compatible with sustainability. A simple and very basic fact. Economic and environmental performance must go hand in hand. The natural environment is centre to all economic activity and growth, providing all the resources we need to produce goods and services, absorbing and processing unwanted by-products in the form of pollution and waste. Environmental assets contribute to managing risks to economic and social activity, helping to regulate flood risks, regulating the local climate (both air quality and temperature), and maintaining the supply of clean water and other resources. Over population in one area threatens the biodiversity and mnatural resources.</p>

Any new builds should be carbon zero or as low as possible.

The 40% minimum affordable homes objective should be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.

Trees and woodland are very valuable to the environment and the community's physical and mental health. I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area.

- An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.
- Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside boundaries. These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.
- The Local Plan should allocate land for new allotments for residents of new homes as well as laying out gardens to support 'Growing your own' (which is both sustainable and good for mental health)
- Public transport must be improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be widened. Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.

Additionally, it was only due to a neighbour alerting us to this proposed building application that you are receiving a response. You need to ask questions to the distribution Company used and/or your approach in advising local residents.

Title	Question: Any other comment
ID	EGS13358
Person ID	490211
Full Name	Ms Barbara Saville
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> • I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown • I am concerned that many residents simply did not know this was going on — publicity was poorly planned and haphazard • Of the small proportion of residents who did get the brochure - many believed they had no way of responding— it was not clear that postal responses were possible as the literature only referred to using the portal or email - those without IT felt excluded. • Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown— they were busy with working-from-home whilst home-schooling children as well a dealing with the challenges of CV19 and lockdown • The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation • There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing and distressing • The consultation excluded cohorts of people who were unaware of it or who could not access it due to lack of IT • It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown • People expect consultations to involve public meetings where officers can explain what is proposed and answer questions • Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, <i>"reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law"</i>.

Included files	
Title	Question: Any other comment
ID	EGS13383
Person ID	1270224
Full Name	Ms Heather Wignall
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated</p>

with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS13400

Person ID 1153922

Full Name Roger Hyslop

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I would like confirmation that my comments will be taken into account.

In my view the scale of building envisaged by the Plan is totally unrealistic in relation to the area's infrastructure and should be rethought.

Included files

Title Question: Any other comment

ID EGS13401

Person ID 1270229

Full Name Homes England

Organisation Details

Agent ID 1270231

Agent Full Name Ms
Rebecca
Dewey

Agent Organisation	Associate Director WSP
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>We write on behalf of our client, Homes England, to submit representations in response to the Dacorum Borough Council ('DBC') Emerging Strategy for Growth 2020-2038, Regulation 18 consultation draft ('the Draft Plan').</p> <p>Homes England exists to accelerate the delivery of housing across England; they are a national agency and non-department public body, sponsored by the Ministry of Housing, Communities and Local Government. We can confirm that Homes England acquired the site (known as Growth Area Bv02) from the Ministry of Justice in 2018 and are in the process of unlocking this site. Homes England are currently undertaking technical studies of their landholding at Chesham Road and Molyneaux Avenue, Bovingdon to support the disposal of the site and ultimately the submission of a planning application for residential development.</p> <p>RESPONSE TO REGULATION 18 CONSULTATION</p> <p>This response primarily focuses on the Draft Plan's position regarding housing provision within Bovingdon, specifically the proposed housing allocation Chesham Road and Molyneaux Avenue (Ref. Growth Area Bv02, Chapter 24), and comments in relation to the Guiding Development policies, as far as they are relevant to this site and Homes England's proposals.</p> <p>We have structured our response according to the questions posed by the online consultation comment form:</p> <ul style="list-style-type: none"> • Question 1: Do you think the overarching vision, the vision for Dacorum's places and the strategic objectives are right for the Borough? • Question 2: Do you have specific comments about the Sustainable Development Strategy? • Question 3: Do you have specific comments about any of the Guiding Development policies? • Question 4: Do you have specific comments about any of the Delivery Strategies? • Question 5: Do you have specific comments about any of the Proposals and Sites? • Question 8: Do you think the Plan is consistent with the National Planning Policy Framework (NPPF) and supporting guidance? • Question 6: Do you have any comments on the Sustainability Appraisal that accompanies the Plan? • Question 7: Do you agree that the Evidence Base that accompanies the Plan is adequate, up to-date and relevant? • Question 5A: Are there any other sites that you think should be included in the Plan? • As set out within these representations, in order for the Draft Plan to be found sound at Examination, the Council needs to: <ul style="list-style-type: none"> • Increase its level of housing provision in line with the most recent Standard Method calculation, to a minimum of 1,023dpa. Due to the historic undersupply of housing and worsening affordability, the Council must plan effectively to meet and exceed this requirement. • Site allocation:

- Amend its interpretation to the NATS safeguarding zones in Bovingdon, removing its reference as justification for enforcing limits on building heights in Bovingdon and at the
- Amend the policies, justifications and Evidence Base to reflect the deliverability of 60 dwellings at The Mount, as well as removing the height limits as per the NATS consultation response, and the requirement for the site to ensure the maintenance and enhancement of the infiltration
- Update redline of allocation to reflect previous
- Update draft Policy SP2 – Spatial Strategy for Growth and SP27 – Delivering

Growth in Bovingdon to reflect allocation of The Mount for 60 homes.

- Note comments in relation to draft guiding policies
 - DM8 – Custom and Self Build Housing
 - SP13 - Delivering High Quality Design

We trust our representations will be taken into account in preparing the next version of the Local Plan. Our client is keen to engage with DBC and wish to continue to be involved in further consultations on the Local Plan process moving forward.

Included files

Title Question: Any other comment

ID EGS13429

Person ID 1270261

Full Name MRS SAFFRON MURRAY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite. Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced. Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.

All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan. " The 40% minimum affordable homes objective should be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.

" Trees and woodland are very valuable to the environment and the community's physical and mental health. I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area.

" An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.

" Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside boundaries. These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.

The Local Plan should allocate land for new allotments for resident of new homes as well as laying out gardens to support "Growing your own"(which is both sustainable and good for mental health)

" Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be widened. Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.

Additionally, some people that I know received a leaflet through the door regarding the local plan. However, an equal amount of people I spoke to did not receive this - it is suggested this is picked up with your distribution company!

Included files	
Title	Question: Any other comment
ID	EGS13464
Person ID	1264853
Full Name	Nick Davis
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>This process has not allowed the public to get adequate timely information or to have constructive debate. Covid19 has prevented people from accessing material available in libraries, and door to door canvassing has not happened in my area. I have also not received any material or information in the mail.</p> <p>This whole proposal is being pushed through, and I feel the council is hoping that the fewer people to understand the scale of this, the better. We understand the need for extra housing. The volumes proposed, in the locations proposed is just not environmentally or ethically sustainable.</p>
Included files	
Title	Question: Any other comment
ID	EGS13477
Person ID	1270266
Full Name	VANDA EMERY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>This plan will not allow Dacorum to meet it's climate targets, neither will it half biodiversity collapse. Most importantly the house building it proposes will not lead to improvements in quality of life or happiness for dacorum's inhabitation, either now or in the future. The is a local plan to allow developers to make large amount of money at the expense of the population. Dacorum council has declared a climate Emergency since the local plan process was initiated and therefore needs to go back to the drawing board. It urgently needs a overarch zero carbon and sustainability strategy to outline how it can forfil it's obligations under it's own Climate Emergency declaration and the national zero carbon targets. Then in light of this it should review it's currently local plan in light of this new overarching strategy, which will likely be found to be inadequate. Dacorum therefore will need a new Climate Emergency local plan covering the next 10 years of the transition. For such a response to an appropriate emergency response to the urgency outlined in it's climate emergency</p>

declaration both these steps need to be completed in the next two years, and all other priorities should go on hold until overarching zero carbon and sustainability strategy is in place. Evidence that climate change and biodiversity loss are emergencies:

<https://www.ipcc.ch/sr15/>

<https://www.ipbes.net/news/Media-Release-Global-Assessment>

The following clarifies UK's obligations within IPCC 1.5C carbon budgets, and that only path way one is a viable and safe option for humanity.

<https://www.cusp.ac.uk/themes/aetw/zero-carbon-sooner/>

Evidence that responding to emergencies requires not just putting something on the agenda, but taking everything else off the agenda and reviewing how it fits in with this new pressing issue.

https://www.greenhousethinktank.org/uploads/4/8/3/2/48324387/climate_emergency_plan_that_fu_cr_may20.pdf

Resources clarifying implications of the above for how our economy and governments (both locally and nationally should respond:

<https://www.greenhousethinktank.org/climate-jobs.html>

<https://www.greenhousethinktank.org/climate-emergency-economy.html>

<https://cat.org.uk/info-resources/zero-carbon-britain/research-reports/> <https://ukfires.org/absolute-zero/>

Due to urgency of response require and all encompassing nature of transition that is needed, it is highly reconomended that council commission a citizen's assembly to shape the overarching strategy and then the subsequent emergency local plan:

<https://extinctionrebellion.uk/wp-content/uploads/2019/06/The-Extinction-Rebellion-Guide-to-Citizens-Assemblies-Version-1.1-25-June-2019.pdf>

Included files

Title Question: Any other comment

ID EGS13479

Person ID 1270268

Full Name AMANDA NAISH

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment	<p>I am a local Water End resident and have been shocked to discover the planning proposals initiated by Dacorum</p> <p>As a resident I have received no information or paperwork in relation to this and having been on the Dacorum website the information is extremely difficult to follow and to comment on hence my email.</p> <p>Residents should have been fully informed of these plans which we have not yet and been given a fair and open platform to voice our concerns and objections</p>
Included files	
Title	Question: Any other comment
ID	EGS13482
Person ID	1270269
Full Name	WENDY CONIAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>2. Process</p> <p>Before commenting on the specifics of the Plan, I would like to register my concern that not enough has been done to ensure that ALL Dacorum residents are aware of and able to respond to this consultation.</p> <p>There are large sections of the community who have not received the DBC booklet about the consultation and many people who have not been able to access the online process. The usual channels such as libraries, civic centres, hard copies of documents and in person exhibitions have not been available.</p> <p>I think the consultation should have been postponed until the worst of the Covid crisis has passed and residents could have a decent chance of accessing the information they require to respond to what is after all, a long and complex data set of utmost importance. It's my belief that this consultation is invalid.</p>
Included files	
Title	Question: Any other comment
ID	EGS13489
Person ID	1270269

Full Name	WENDY CONIAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>7. Lack of Coherence and Strategy</p> <p>The Plan fails to take into account the combined impacts of the coronavirus pandemic and recently expanded permitted development rights, both of which create many more opportunities for conversion of commercial space (especially office and retail) to residential use, and thus windfall provision of housing throughout the Borough is likely to be much higher than estimated. A more positive place making strategy is needed as part of a formal brownfield land review to realise local enhancement of the existing built environment with benefits for existing residents.</p> <p>This will ensure much greater emphasis should be given to regeneration of previously developed land in order to reduce the amount of housing and employment development on Green Belt and other greenfield sites outside of existing towns and villages.</p> <p>There is an over-reliance on aspirational growth strategies and partnerships which have not been subject to public consultation and scrutiny. The Emerging Strategy for Growth appears to be based on selective strategy documents (Dacorum Growth & Infrastructure Strategy to 2050, Dacorum Corporate Plan 2020-2025 and Corporate Action Plan) that have no formal planning status and which have not been widely consulted on.</p> <p>As a result, the Plan has failed to take account of a number of important issues - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs. The pursuit of economic growth as promoted by the Hertfordshire Local Enterprise Partnership and implied by background work for a South West Herts Joint Strategic Plan, should be balanced against environmental concerns and climate obligations before they are tested through the local plan process.</p> <p>There are knock on implications on this Plan of the withdrawal of St Albans Submission Local Plan. This Strategy assumes that large areas of Green Belt land east of Hemel Hempstead and in St Albans District will be allocated for residential and employment development as part of the Hemel Garden Communities project. The St Albans Submission Local Plan has recently been withdrawn from Examination as the Inspectors advised that it would not be found 'sound'. The proposed sites north of Hemel Hempstead (5,500dw) in Dacorum must be called into question if there is any doubt about the future viability of the Garden Communities project as a whole.</p> <p>8. Conclusion</p>

It is my profound belief that DBC should withdraw the proposed Plan and revisit it taking account of the Government's own guidance that greenbelt release is not required to meet housing 'targets'. The required number of new houses should be revised down, using the latest data and social trends.

I have read the CPRE response to the Plan and I would like to see Dacorum Borough Council develop a Local Plan based on the principles set out in the recently published "Vision for Planning" which CPRE in collaboration with 18 national organisations have presented to the government.

Crucially, in my view, a revised Plan should have sustainable development and action on the climate emergency at its heart. It should protect and enhance local green spaces and heritage for the benefit of people and nature.

It should recognise and act to deliver enough quality affordable and social homes for purchase and rent to meet local needs. This means moving beyond the current mechanisms to ensure the right amount of affordable and social homes in accessible urban locations.

It must encourage green and sustainable forms of transport and redevelop our urban areas to realise more vibrant mixed use town centres and encourage shifts towards walking, cycling and green public transport as the main forms of transport. Health and well-being are paramount to our communities. This Local Plan will make life worse for existing residents and offer a congested, polluted market town, stretched beyond its limits, to anyone thinking of moving here.

Please withdraw this plan and revise it based on realistic assessment of the actual housing need, with the climate emergency at its centre and consult on it widely, ensuring that ALL residents have a chance to understand and comment on it.

Included files

Title Question: Any other comment

ID EGS13504

Person ID 1270278

Full Name CHRISTOPHER COOK

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Reference Long Marston
This plan is far too excessive and out of character for the local area.

A rural situation which will be extensive altering the area and landscape. Local working farms which have provided and sustained the country during the covid pandemic are to be compulsory purchased therefore reducing the agriculture productivity in this area.

Included files

Title Question: Any other comment

ID EGS13518

Person ID 1270285

Full Name MARTIN WELLER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein

for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS13520

Person ID 1270286

Full Name TAMZIN PHILLIPS

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Signposting community events
Local events are no longer part of a free newspaper that many people used to read. Are there ways of signposting events eg. A regular email that people could sign up to. The visitors centre in town also used to play a big role in sharing information amongst the community.

Included files

Title Question: Any other comment

ID EGS13521

Person ID 1270287

Full Name TERE KNOWLES

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	I would like to object. I have my own views and have not been coerced by any outside influence. Please reconsider your decision and give it more time for reconsideration.
Included files	
Title	Question: Any other comment
ID	EGS13522
Person ID	1270288
Full Name	VIVIENNE EDWIN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	I am totally against what is proposed and also feel this should be managed virtually in a pandemic. This disenfranchises a large proportion of Dacorum residents who are not on line.
Included files	
Title	Question: Any other comment
ID	EGS13529
Person ID	1270291
Full Name	Mr Mark Smith
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>I am disappointed by the plan – although I appreciate that towns need to expand, the current plans for expansion are far too severe with far too many houses planned. This number sounds ill-considered and will adversely affect the balance of the town with excess strain put on schools, doctors, dentists and an increase in road traffic and commuting.</p> <p>Berkhamsted is a lovely place to live – with period charm, swathes of countryside within walking distance and just the right size – a perfect combination, please don't ruin it with over development.</p>
Included files	
Title	Question: Any other comment
ID	EGS13569
Person ID	1145921
Full Name	Mrs Elinor Stacey
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>These plans need to be fully evidence based and accessible to all for consultation. Sadly this has not been feasible with the current consultation due to COVID restrictions, the consultation portal is difficult to navigate including for submission of responses with nil consideration for the many in the community who do not have internet access. A mail drop barely a month before consultation closure fails to constitute a fair and inclusive process.</p>
Included files	
Title	Question: Any other comment
ID	EGS13576
Person ID	1227768
Full Name	Ms Denise Young
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Having lived in this town my entire life I have witnesses the removal and deconstruction of practically all of the best adult/family entertainment venues in this town - the Pavillion, countless pubs that hosted live music as well as social clubs, nightclubs, bars, arcades, swimming centres, bowling, pool halls, Quasar, and many others. To compound this, the population has grown significantly already and the residents are feeling it.</p> <p>Not planning to provide social activities for residents is highly detrimental to people's mental, physical and social health. Planning to increase the population of the borough by an additional 50,000+ people without planning for these improvements will compound this issue even further. Residents need to be provided with a wide variety of options for things to do. There's only so many times you can go for a meal and head to the cinema.</p> <p>High streets should no longer be focused purely on shopping, which is being driven out by online shopping, and instead should offer a range of entertainment venues for residents. This will provide jobs and bring high streets to life. Entertainment venues should be suitably sized. The Old Town Hall has a capacity of around 100 people. This is not suitable to cater for a growing town which will soon have a population to rival cities. Entertainment venues can cater for local groups such as amateur dramatics, local music festivals, open mic nights and then have the potential to draw in larger acts in terms of comedians, musicians and bands, theatre productions, etc.</p> <p>After COVID, people will be craving and valuing these facilities more than ever before.</p> <p>Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite. Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced.</p> <p>Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.</p>
Included files	

Title	Question: Any other comment
ID	EGS13582
Person ID	1227768
Full Name	Ms Denise Young
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Additionally, some people that I know received a leaflet through the door regarding the local plan. However, an equal amount of people I spoke to did not receive this - it is suggested this is picked up with your distribution company!
Included files	

Title	Question: Any other comment
ID	EGS13615
Person ID	1270319
Full Name	Ms Nicola Withers
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an

updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS13632

Person ID 1145871

Full Name Mr Gareth Morris

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing

supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

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Included files	
Title	Question: Any other comment
ID	EGS13645
Person ID	1270343
Full Name	KEITH DELDERFIELD
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty.</p>
Included files	
Title	Question: Any other comment
ID	EGS13649
Person ID	1270345
Full Name	CLARE SIDEBOTTOM
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> • The way this process has been managed is disgusting. People's wellbeing and mental health is under so much pressure at the moment due to the pandemic. People have been ill/dying of Covid; people have been made redundant/living in

fear of being made redundant; parents are home schooling and juggling jobs and you choose now to push this through? People don't have time to give this the consideration that it requires. We haven't received literature about it, the majority of people on our estate are pensioners who aren't on Facebook/online so it should not be such a digital process, we should have received balanced detailed paperwork about this months ago. The minute we went into Lockdown the plans should have been put on hold until everyone had time to give this the due consideration it requires.

Included files**Title** Question: Any other comment**ID** EGS13657**Person ID** 1259288**Full Name** Maria de Farago Botella**Organisation Details****Agent ID****Agent Full Name****Agent Organisation****Yes / No** Yes
* Yes
* No**QUESTION ANY OTHER COMMENT comment** My general comment is that although the plan refers extensively to sustainability, climate change, environment and biodiversity, it is not specific enough on which measures and specific limits (parameters) will be put in place to ensure that the development is compliant with the current Climate emergency times. If green belt is to be developed a large part of the area should be re-wilded and connected to current natural habitats. In addition, the plan seems far too ambitious in the number of houses to be built hence very challenging to make it sustainable.**Included files****Title** Question: Any other comment**ID** EGS13664**Person ID** 1207133**Full Name** Chilterns Conservation Board**Organisation Details** Chilterns Conservation Board**Agent ID****Agent Full Name**

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Chilterns Conservation Board (CCB) is grateful to be consulted on the Dacorum Borough Council's new local plan throughout its inception and the current consultation draft.</p> <p>Our response, which begins on the following page, starts with an overall summary of our position on the draft local plan, and then gives more detail with regard to particular sections, policies and proposals (referenced and in plan order). Each element indicates whether our statement is in support, objection or as a comment. We did not find either the online portal or the downloadable pro forma to be conducive to an effective response, and we trust that this will be acceptable.</p> <p>There is much to be commended about the plan, but we also have serious reservations. We are, however, strongly supportive of the council taking steps to continue progressing with consultation on the plan in these difficult times. It is essential to have an up-to-date plan in place at all times for the sustainable management of development in an area with such a potent combination of development pressures, regeneration aspirations and a sensitive environment. The council is to be commended for the steps it has taken to give stakeholders as much of an opportunity to comment on the current proposals as it can under the current circumstances.</p> <p>Further information about the Board and its role is appended at the end of this document.</p> <p>CCB is grateful for the opportunity to comment and looks forward to continuing engagement with members and officers on the plan as it progresses to the publication stage.</p>
Included files	
Title	Question: Any other comment
ID	EGS13700
Person ID	1270359
Full Name	Mr John Dowling
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	

QUESTION ANY OTHER COMMENT comment	In the case of the Long Marston site but also generally, I would like to see much greater understanding and recognition of large scale proposals and activities in adjacent counties (Bucks and Beds) so that proposals are viewed in the light of the big picture.
Included files	
Title	Question: Any other comment
ID	EGS13706
Person ID	1270361
Full Name	Mr Jon Whysall
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite. Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced.</p> <p>Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.</p> <p>All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.</p> <ul style="list-style-type: none"> • The 40% minimum affordable homes objective should be enforced across the Too often developers in the past have been allowed to waive their affordable homes commitments. • Trees and woodland are very valuable to the environment and the community's physical and mental I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area.

- An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.
- Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside boundaries. These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.
- The Local Plan should allocate land for new allotments for resident of new homes as well as laying out gardens to support 'Growing your own'(which is both sustainable and good for mental health)
- Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.

We are facing a climate emergency and addressing this must be at the absolute core of Dacorum's Local Plan. Currently it is not. We have the knowledge and technology to make good affordable zero carbon sustainable homes. We must demand that the Local Plan prioritises this.

Included files

Title Question: Any other comment

ID EGS13720

Person ID 1263002

Full Name Rhona Denness

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

This plan appears to accept and support growth that is far in excess of estimated population increase. It follows on from this basic assumption in all the excessive and disproportional plans for Tring. It reads as a developers plan (based on economics) rather than providing a forward looking vision for the 21st century, in the context of climate emergency.

Duty to Cooperate with other Local Councils

As above, there is no evidence that this duty has been met as part of this plan, and indeed it appears as a protocol to be done after planning has taken place rather than as an integral part of the plan. As Tring is bounded on two sides by Buckinghamshire, cross boundary impacts are considerable.

This is required as part of objectively assessing need before then using Green Belt land to meet thus identified needs.

I agree with the following from the Grove Fields Residents association response to the Local plan:

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

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I agree with the following from the Tring in Transition response to the local plan:

On Distinctive Developments and Vision for the Future

The need for ‘distinctive’ development is mentioned several times in connection both with the natural and built environments (e.g., ‘All settlements will have retained their separate and distinctive identities informed by proposals that were shaped by a detailed understanding of place.’ – Overarching Vision, page 22).

It is not clear how this will be either defined or agreed for Tring, which is arguably the most distinctive settlement in Dacorum in terms of natural setting, social and economic history. Neither is it clear how this will be given ‘teeth’ in order to proactively shape development.

There is a real opportunity here for Dacorum to create an exemplar Plan and an opportunity to work with local groups sooner rather than later.

In the absence of a working definition, Tring in Transition has created an initial description of what makes Tring distinctive to help shape what we would expect to see in the final version of the Plan. This highlights our unique heritage and location, including:

- A Rothschild legacy of forward-thinking development, respect for the environment, bold and challenging designs and solutions.*
- A strong heritage of local renewable energy with significant wind and waterpower.*
- A location surrounded by more than 50% of Dacorum’s SSSIs, extensive AONBs, as well as extensive hedgerows and other wild places.*
- A service-oriented, agricultural, market legacy and a traditional destination location to visit, meet, relax and socialise.*

1 '21st Century Market Town'

To address the need for growth, enhance the existing town centre and correct assumptions apparently carried over from previous planning exercises (traceable back to the 1990s).

We proposed taking a lead from existing '21st-century market town' schemes successfully being deployed in Yorkshire, Stroud etc. In summary, this includes recognising the limited need for new town centre retail space; acknowledging that central supermarkets are more damaging environmentally than those designed to limit travel and traffic congestion; and acknowledging changing employment patterns and social norms (this is especially true for Tring).

- Replace proposals for significant new retail space and encourage more food, experiential, social, entertainment and 'destination' spaces etc.*
- Revisit plans for a central supermarket (which will only add to issues with existing traffic hot spots) and recognise the patterns of use from those living in villages to the north of Tring. (Depending on revisions to developments – this could well be at the Bulbourne side of town.)*
- Remove proposals for warehousing and large industrial units on the Dunsley Farm site and build on Tring's heritage as a service-oriented market town by building smaller, more flexible workspaces that reflect rapidly growing local/home-working patterns.*
- Revisit plans for Tr06/Brook St: prioritise schemes fronting to the High Street, encouraging food, social and 'destination' spaces.*
- Recognise that Dunsley Farm is better suited to residential home development than light industry – meeting both social and employment needs.*

1 'Linked Wildlife Corridors'

To address pressures on local green spaces, SSSIs, biodiversity and Green Belt loss.

*The definitions of open spaces, green spaces, green buffers and wildlife corridors need to be more explicit. They are a consistent cause of confusion and question in the Plan. There is a need for all of these, but given the high number of SSSIs around Tring, AONBs, the Beechwood SAC, etc. **there is an opportunity to establish a country-leading if not world-leading scheme where defined wildlife corridors are proactively established around the entire perimeter of the town, through new developments and onwards to local nature reserves etc.***

- Implement joined-up wildlife corridors through and around all new developments.*
- Explicitly plan to proactively link all SSSIs via wildlife/green corridors.*
- Provide managed public access through a new network of paths.*
- Provide an opportunity for the various organisations managing local wild spaces (Woodland Trust, National Trust, Wildlife Trusts, Chiltern Society, Rothschild Estates etc.) to work together with the Council to design and build this. (An initial poll of these organisations indicates a strong willingness.)*
- Recognise NPPF requirement that any Green Belt development requires explicit mitigation and improvement on other Green Belt land. (The inclusion of green and open spaces in existing Green Belt parcels earmarked for development does not count towards this.)*

1 'Sustainable Energy Use'

To address county and national carbon targets and to reinvent Tring’s legacy of renewable energy use. We acknowledge statements about going beyond current government guidelines on new housing insulation. This sounds good but will already be superseded by more demanding targets before we are halfway through the term of this Plan. We are also aware that developers have pushed back with statements like ‘we don’t find a market for solar panels’ etc. These are, frankly, irrelevant and should be entirely disregarded.

Developments around Tring have a clear and new opportunity to embrace the highest possible standards that can be mandated (if not higher):

- *All new developments built to highest possible standards of carbon neutral build and energy efficient operation.*
- *Renewable energy targets, inclusion of solar systems in new homes etc. (regardless of any developer pushback) should be explicitly mandated.*
- *See our detailed response to SP24 etc.*

Included files

Title	Question: Any other comment
ID	EGS13735
Person ID	1270365
Full Name	Trustees of Gaddesden Estate
Organisation Details	Trustees of Gaddesden Estate (GaddesdenTrust)
Agent ID	1270367
Agent Full Name	Mr David Fletcher
Agent Organisation	Director – National Development & Planning Strutt and Parker
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Strutt & Parker have been instructed to submit representations on the Council’s emerging growth strategy for the Dacorum Local Plan, on behalf of the Trustees of the Gaddesden Trust Dacorum Borough Council is in the process of preparing a new Local Plan for the period 2020-2038. Once adopted, the new Dacorum Local Plan will replace the Site Allocations Development Plan Document (2016), Core Strategy (2013) and ‘saved policies’ from the Dacorum Borough Local Plan (2004).

This representation seeks to object to the proposed growth strategy and two housing allocations included in the emerging Local Plan. The emerging policies within the Local Plan, that are considered to be unsound are set out as follows:

- Policy SP2: Spatial Strategy for Growth;
- Policy SP4: Delivering the Housing Strategy;
- Policy Growth Area HH01: North Hemel (Phase 1); and
- Policy Growth Area HH02: North Hemel (Phase 2).

This representation sets out in detail why we consider the above policies to be unsound, having regard to the relevant tests set out within national policy.

The National Planning Policy Framework (NPPF) states that there should be a presumption in favour of sustainable development in the plan making process which means positively seeking opportunities to meet the development needs of an area and be sufficiently flexible to adapt to change. One of the key objectives for plan marking is that plans should be aspirational but Positively prepared plans and with deliverability strategies are key tests of soundness.

The emerging Local Plan and the policies listed above are considered to be unsound, as it is not positively prepared or deliverable, for the following reasons, which we will expand upon in further detail within this representation:

- The allocation of North Hemel garden settlement is not the most appropriate strategy, when considered against the alternatives. The allocation is both of an inappropriate size and is situated within an unsuitable location. The focus should be on the ability to deliver a higher number of smaller to medium sized sites that are capable of being delivered in the short to medium term.
- It is questioned whether the North Hemel expansion is deliverable or economically the most suitable option having regard to the cost of the infrastructure and the density of the proposed housing development.
- The proposed development of Hemel North will have an adverse impact upon the Chilterns Area of Outstanding Natural Beauty (AONB). There are alternative locations that do not impact upon the AONB which should be a focus for growth.
- The proposed development will result in significant visitor pressure upon the AONB, that do not appear to have been adequately mitigated. In particular, there will be significant impact on public rights of way to the north of the site and Ashridge Beach Woods Special Area of Conservation (SAC).
- That the proposed development is not consistent with the environmental dimension of sustainable development within the NPPF, having regard to the loss of green space, carbon capture and biodiversity and lack of robust mitigation strategy to off- set this environmental impact.

It is also considered that further consideration needs to be given to the housing need within Dacorum and Hemel Hempstead, accounting for the likely change to homeworking as a result of the Covid-19 pandemic, which is likely to result in office to residential conversions within Hemel Hempstead.

Whilst it is our strong view that policies HH01 and HH02 should be removed from the plan, in order for it to be considered as sound, in the event that the policies are retained within the plan, the policy wording needs to be amended in order to safeguard the AONB and protect neighbouring residential receptors. We will set out our proposed amendments to the policy wording within section 7 of this report.

The land owned by our client, immediately abuts the northern boundary of the proposed Hemel North allocation areas.

Included files

Title Question: Any other comment

ID EGS13751

Person ID 1270368

Full Name Mr Charlie Laing

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS13762

Person ID 1270372

Full Name Janet Tuppen

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

19. Finance and Influence. The larger property development companies are mostly making good profits, and they have spent money on influencing decisions. This leads to an imbalance between developers and local people in the decision-making process.

- At a high level, there have been significant political party donations, notably by Thakenham to the Conservative Party (their sponsorship was evident at the 2017 Conservative Party Conference). At a local level, it is evident that developers have been hiring expensive legal teams to comb through the Local Plan decisions if they think they have been unfavourably treated. For example, Crest Nicholson, who own the land adjacent to Blegberry Gardens . Their lawyers at spbroadway have made a substantial case as to why their parcel of land should be included, when initial assessment for DBC recommended that this portion of land should be removed from consideration as it had a high sensitivity. It is now back in the Strategic Assessment.
- This places the land developers in a position of significant influence, which is in huge contrast to the influence of local people – whether individuals or community organisations. This means that local residents do not have an equal voice in the process, and it is particularly noticeable at this time when the consultation is happening during the Covid-19 lockdown.

Included files

Title Question: Any other comment

ID	EGS13781
Person ID	1270380
Full Name	Mrs Samantha Weston
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I strongly object to the Addendum to AECOM Site Assessment Study which considers a potential new settlement of up to 3,400 houses between Wingrave and Long Marston.</p> <p>In the plan the management of development in rural areas states that in all cases development in the Rural area should not result in harm to the character or appearance of the countryside or the existing character of the village.</p> <p>For such a settlement huge new infrastructure would be required and there would be serious impacts on traffic for Long Marston and Wingrave.</p> <p>There is significant risk of flooding, with surface floods and water courses already present. The land is often under water.</p> <p>There are sites of archaeological interest and obvious potential for damage to the heritage and special character both of Long Marston and Wingrave.</p> <p>There would be serious and irreversible damage to countryside and the outlook close to the Chilterns Area of Outstanding Natural Beauty and it is adjacent Local Wildlife Site which would be threatened by this development.</p>
Included files	
Title	Question: Any other comment
ID	EGS13793
Person ID	

Full Name	
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Having lived in this town my entire life I have witnessed the removal and deconstruction of practically all of the best adult/family entertainment venues in this town - the Pavillion, countless pubs that hosted live music as well as social clubs, nightclubs, bars, arcades, swimming centres, bowling, pool halls, Quasar, and many others. To compound this, the population has grown significantly already and the residents are feeling it.</p> <p>Not planning to provide social activities for residents is highly detrimental to people's mental, physical and social health. Planning to increase the population of the borough by an additional 50,000+ people without planning for these improvements will compound this issue even further.</p> <p>Residents need to be provided with a wide variety of options for things to do. There's only so many times you can go for a meal and head to the cinema.</p> <p>High streets should no longer be focused purely on shopping, which is being driven out by online shopping, and instead should offer a range of entertainment venues for residents. This will provide jobs and bring high streets to life. Entertainment venues should be suitably sized. The Old Town Hall has a capacity of around 100 people. This is not suitable to cater for a growing town which will soon have a population to rival cities. Entertainment venues can cater for local groups such as amateur dramatics, local music festivals, open mic nights and then have the potential to draw in larger acts in terms of comedians, musicians and bands, theatre productions, etc.</p> <p>After COVID, people will be craving and valuing these facilities more than ever before.</p> <p>Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite.</p> <p>Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced.</p>

Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.

Included files

Title Question: Any other comment

ID EGS13799

Person ID

Full Name

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment Additionally, some people that I know received a leaflet through the door regarding the local plan. However, an equal amount of people I spoke to did not receive this - it is suggested this is picked up with your distribution company!

Included files

Title Question: Any other comment

ID EGS13810

Person ID 1163978

Full Name John Wignall

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS13811

Person ID 1270385

Full Name Ms Katy Regan

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes

* No	
QUESTION ANY OTHER COMMENT comment	<p>I found your portal difficult to navigate but wanted to express my sincere objections to the local plan for housing development and so have copied and pasted this from the Liberal Democrats. I agree wholeheartedly with this and would be very grateful if you could take my response into consideration.</p> <p>Introduction</p> <p>The Dacorum Local Plan for the next 18 years needs to provide the right homes, in the right places for local people, and rise to the twin challenges of climate change and a (post) COVID-19 world.</p> <p>We would like to thank the exceptionally dedicated Officers of DBC for their excellent work in putting together this plan. With the competing needs of a growing population and the Climate Emergency, not to mention an excessive target from MHCLG and a rapidly changing society it is inevitable that there will be disagreement on the best way to proceed, but this does not in any way diminish our appreciation for the efforts of our officers.</p> <p>There has been a shortage of affordable housing across the UK in recent years, and in Dacorum in particular, there is an acute shortage of social housing. At present there are over 7000 people on the housing list in Dacorum, and despite a modest social housing building programme by DBC this figure has been increasing in recent years. Our build programme, whilst laudable, has not been keeping up with the increasing need.</p> <p>In an attempt to make housing more affordable across the Country, Government set a target of building 300,000 new homes per year. It is intended that this be achieved through setting local housing targets at a national level, using the 'standard method'. The standard method is an algorithm which increases the housing target above Office For National Statistics ('ONS') projections for areas where the housing is unaffordable. This approach assumes that increasing housing stock above housing demand will result in a reduction in house prices. Whilst this may appear to be a logical approach, it inevitably results in increased housing target figures for areas in the London commuter belt and in the South of the country as a whole. London is not affordable for a large proportion of people working and living there, and so it is a well trodden path to move out of London into commuter belt towns when you want to buy a home, or start a family.</p>
Included files	
Title	Question: Any other comment
ID	EGS13828
Person ID	777073
Full Name	Mrs Anne Lyne
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Dacorum Borough Council has decided to go ahead with this “consultation” on a crucially important and massive plan for the future of our Borough, affecting the future of all its residents at a time when, due to the current pandemic, those residents cannot have full and easy access to the documents. In addition, some of the necessary documents are not yet available at all. The booklet sent round to homes is a totally inadequate explanation of what is actually planned, how it will affect residents and not all homes have received it anyway.</p> <p>Dacorum Borough Council has decided to go ahead with this “consultation” on a crucially important and massive plan for the future of our Borough, affecting the future of all its residents at a time when, due to the current pandemic, those residents cannot have full and easy access to the documents. In addition, some of the necessary documents are not yet available at all. The booklet sent round to homes is a totally inadequate explanation of what is actually planned, how it will affect residents and not all homes have received it anyway.</p> <p>The Council have refused to extend the consultation, despite the fact that, within weeks the public will be allowed more freedom of movement and therefore greater access to real documents. As it is those without internet access are severely disadvantaged. The information online is much as it was with the Core Strategy, dense and unfathomable except to those are experienced. It would appear that Dacorum Borough Council does not actually want the public to engage with the plan.</p>
Included files	
Title	Question: Any other comment
ID	EGS13843
Person ID	777073
Full Name	Mrs Anne Lyne
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	

* No	
QUESTION ANY OTHER COMMENT comment	<p>We seem to be losing too much open green space. Hemel has always made up for its architectural design failings because of its large areas of open green space. This Plan gives the impression that this policy will be abandoned in practice, whatever the words used claim.</p> <p>Developments already taking place as well as those planned seem to be taking away green space/green borders, particularly in the town centre.</p> <p>Green Belt: Under the Core Strategy land was removed from the Green Belt and new “firm” boundaries set, under the premise of safeguarding our precious Green Belt for the future. The Core Strategy has hardly been implemented, yet the current plan is proposing much greater development on Green Belt land. As said so often before, the Green Belt provides the lungs of the urban areas and the its reduction will have a detrimental effect on the health and well-being of citizens, but also of plants and wildlife. Access to the countryside is being made harder and harder, and will require greater use of cars to achieve this at a time when you are planning to reduce vehicle use in the interests of climate change. No further development should not take place on Green Belt land until it is proved that all possible brownfield land has been sensibly used.</p> <p>NPPF 13. Protecting Green Belt Land</p> <ol style="list-style-type: none"> 1 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. <p>Given that it is demonstrated that Dacorum’s imposed housing targets are ridiculously high, there is much less need to build on any Green Belt land. Housing need does not in itself provide an exceptional circumstance for Green Belt development.</p>
Included files	
Title	Question: Any other comment
ID	EGS13858
Person ID	1270387
Full Name	Mr Richard Pilkinton
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Replying to the consultation has been made very difficult.</p> <p>The time available for comments had to be extended given that the Plan was published close to Christmas and not long before the latest Covid lockdown.</p> <p>The quality of the maps is unacceptable. Details of sites cannot be seen. Publicity about the consultation has been poor.</p> <p>The first two prescribed questions are woolly and would be better following the later questions. The Plan is very complicated and asks questions of summarised policies followed by questions on the same policies in detail.</p> <p>The document circulated in early February was not very helpful as it did not include the questions which are to be responded to, and did not give adequate information for them to be located on the DBC web site.</p> <p>It is not clear how many DBC and TRL Ltd staff were employed in producing the consultation documents, but for individuals the time required to wade through the documents is very considerable.</p> <p>It looks like more lip service has been paid to consultation than encouraging responses.</p>
Included files	
Title	Question: Any other comment
ID	EGS13873
Person ID	611689
Full Name	Mrs Sheila Pilkinton
Organisation Details	Markyate Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Replying to the consultation has been made very difficult.

The time available for comments had to be extended given that the Plan was published close to Christmas and not long before the latest Covid lockdown.

The quality of the maps is unacceptable. Details of sites cannot be seen. Publicity about the consultation has been poor. The first two prescribed questions are woolly and would be better following the later questions. The Plan is very complicated and asks questions of summarised policies followed by questions on the same policies in detail.

The document circulated in early February was not very helpful as it did not include the questions which are to be responded to, and did not give adequate information for them to be located on the DBC web site.

It is not clear how many DBC and TRL Ltd staff were employed in producing the consultation documents, but for individuals the time required to wade through the documents is very considerable.

It looks like more lip service has been paid to consultation than encouraging responses.

Included files

Title Question: Any other comment

ID EGS13883

Person ID 1270388

Full Name Mr & Mrs David & Emma Robertson

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS13884

Person ID	1270388
Full Name	Mr & Mrs David & Emma Robertson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty</p>
Included files	
Title	Question: Any other comment
ID	EGS13920
Person ID	1207810

Full Name	Louisa Groves
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>I will reiterate my points:</p> <p>The number of homes is too high. The focus should be about making Hemel and the whole of Dacorum a nicer place to live, not about how to meet government building targets.</p> <p>No Green Belt land should be released.</p> <p>Too much high rise housing proposed.</p> <p>DBC have declared a climate emergency, yet you will generate vast amounts of CO2 by constructing 16,600 new homes whilst removing green space, which soaks up CO2 - there is no logic here at all.</p> <p>No plan for the lack of water or the effect this will have on the species that live in the chalk streams</p> <p>Residents have already been ignored after having given feedback regarding the Station Gateway development. Not being listened to!</p> <p>I would also like to add that not only as this proposal been put out for consultation at totally the wrong time but that Covid is going to drastically effect everything you have proposed! People are commuting less and working from home more. A report by the Economic Statistics Centre of Excellence, published in January 2021, suggests that the UK population may have fallen by as much as 1.3 million people as a result of Covid, which includes a decrease in London of almost 700,000. Therefore, themodel for the proposed plan is already out of date!</p>

Please find attached feedback regarding your local plan. I would like to add that I think Dacorum Borough Council have acted incredibly irresponsibly by putting this plan out for consultation during a national pandemic.

Residents are under a huge amount of stress home schooling and working from home. It feels like you have taken advantage of your local communities by not waiting until it is safe for a proper consultation in the hope that people will either not have time to comment or may not have even heard about the consultation at all as it is all online.

I hope that you listen to the feedback given rather than asking for feedback which is then ignored which seems to have been what has happened in previous consultations.

Included files

Title Question: Any other comment

ID EGS13930

Person ID 1270392

Full Name Ms Anna Skingley

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure

associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files	
Title	Question: Any other comment
ID	EGS13980
Person ID	1270411
Full Name	Ms Jacqui Parr
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite. Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced.</p> <p>Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.</p>
Included files	
Title	Question: Any other comment
ID	EGS14008

Person ID	1270424
Full Name	OLNEY JOSEPHINA
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Furthermore, I feel very angry that you have a consultation during a pandemic, when people's movements are restricted, working from home and homeschooling their children. Many have also been shielding. So, unless you read the Berkhamsted Gazette (I only occasionally do), go to the library (who does in these restricted times) or go on the Dacorum website, you will have been totally unaware of what is being planned. In other words, you are being disenfranchised.</p> <p>Surely, it would have been fairer to have sent each household a plan of your proposals through the post. There are many elderly and home bound people who find it difficult to access or use the Internet, or have no internet at all.</p> <p>For those working at home and looking after the needs of their children, they will not have the time, during this pandemic, to spend hours online to get the details of the proposals.</p> <p>During this pandemic, people's work and shopping habits have, possibly permanently, changed. Therefore a review of the plans should be considered, to include change of use for commercial buildings in the high streets and urban areas to residential.</p> <p>But, most shockingly of all, were the votes of Conservative councillors at last Wednesday's Council meeting, against extending the deadline, even though they know the plans are flawed. The details are surely in the minutes of this meeting.</p> <p>This leaves me with just one question. Who do these councillors represent? Probably, in this instance, not the local residents that put them there to look after their concerns and interests. Maybe the lobbyists for the construction companies have been very busy. Let's face it, to build on green belt is so much easier (and very much cheaper and profitable) than having to clear existing sites.</p>
Included files	
Title	Question: Any other comment
ID	EGS14015
Person ID	1146072
Full Name	Helen Cole

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>I object to the fact that the consultation has taken place during a pandemic and that the closing date for comments is during a national lockdown. This will inevitably mean that many people will have been prevented from commenting because they are either unaware of the plan, or cannot access the material which is only available online. This will particularly discriminate against the older population and there is a danger that their views will not be heard.</p> <p>The way the online commenting system has been set up is also, in my view, going to result in reduced numbers of responses as it is extremely time consuming to navigate all the documents and the content is high on top level wordy statements and very low on actual detail. The layout of the comments form is off putting to those unfamiliar with the vocabulary used, to those unfamiliar with council and planning terminology the headings are meaningless. With many people struggling at the moment to find time to juggle work and home-schooling, the length of time required to respond to this consultation will prevent many from commenting. This does not mean however that they agree with the plan.</p>
Included files	
Title	Question: Any other comment
ID	EGS14037
Person ID	1270428
Full Name	KIERAN HOLLAND
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	

**QUESTION ANY OTHER
COMMENT comment**

High streets will no longer be focused purely on shopping, which is being driven out by online shopping, and instead should offer a range of entertainment venues for residents. This will provide jobs and bring high streets to life. Entertainment venues should be suitably sized. The Old Town Hall has a capacity of around 100 people. This is not suitable to cater for a growinn terms of comedians, musicians and bands, theatre productions, etc.

After COVID, people will be craving and valuing these facilities more than ever before.

Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite.

Our housing needs will need to be reflected some more. Our economy may take until 2038 to recover from the covid Pandemic. Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.

All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.

" The 40% minimum affordable homes objective should be enforced across the Borough. Too often developers in the past have been allowed to waive their affordable homes commitments.

" Trees and woodland are very valuable to the environment and the community's physical and mental health. I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area.

" An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife corridors.

" Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside boundaries. These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.

" The Local Plan should allocate land for new allotments for resident of new homes as well as laying out gardens to support ‘

Growing your own’(which is both sustainable and good for mental health)

" Public transport must be greatly improved both to connect these new homes - regular electric shuttles to the station/town centre also to reduce traffic congestion on the roads which cannot be widened. Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.

Included files

Title

Question: Any other comment

ID

EGS14070

Person ID

1270476

Full Name

ALISON CHESHIRE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I am concerned that this consultation was launched during the second national lockdown of the pandemic and continued running despite a third national lockdown. I am concerned that many residents, including my immediate neighbours and friends in the community, had NO IDEA this was going on. Had it not been for the information shared by Cllr. Lara Pringle, I would’ve missed this opportunity to object.

Publicity has been near non-existent bar the comms from Cllr. Lara Pringle, and that’s coming from me who is always on top of social media, emails etc..

Of the small proportion of residents who did get the brochure, many believed they had no way of responding. It was not clear that postal responses were possible as the literature only referred to using the portal or email. Those without IT felt excluded. Many people who care deeply about the loss of Green Belt did not have time to research this and write a response during lockdown. They were busy with working-from-home whilst homeschooling children as well as dealing

with the challenges of CV19 and lockdown. The lockdown rules meant that people could not attend public libraries or The Forum to view hard copies of the plan because this would entail making unnecessary journeys which were unlawful during most of the period of this consultation.

There was conflicting advice from the leadership of Dacorum Borough Council during this time, about whether it was appropriate to attend libraries or the Forum which was confusing. It was not possible for councillors or their teams to knock doors to alert residents to the consultation or assist them by explaining it because of the rules of lockdown.

People expect consultations to be transparent and fair – by having public meetings where officers can explain what is proposed and answer questions. Neighbouring Buckinghamshire Council withdrew the Chiltern and South Bucks local plan, partly due to CV19, noting that a revised plan would be drawn up to, "reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law".

Included files

Title Question: Any other comment

ID EGS14094

Person ID 1261168

Full Name Pat Whiteman

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment The timing of this plan to develop a long term strategy for growth is completely wrong. Planning on this scale should be halted while we live through the Covid pandemic and understand what permanent changes it has brought about. It is clear previous assumptions about, for example, retail and transport requirements will no longer be valid in the future. A plan drawn up at such an uncertain time cannot claim to be evidence based.

Included files

Title Question: Any other comment

ID	EGS14119
Person ID	1270501
Full Name	DAVID WHITE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, requires Dacorum Borough Council to notify residents and other persons carrying on business. Dacorum's consultation process does not comply with these regulations. On the contrary, many people in Northchurch have either not heard of the consultation or have no means of responding.</p> <p>Many homes in Northchurch did not receive Dacorum's brochure. During the extended period of the consultation, residents from Northchurch and surrounding streets, including some parish councillors have told us that the brochure has not been delivered to their street including Granville Road, Cowslip Meadow, Lyme Avenue, The Meads, Darrs Lane, Northchurch High Street, Tring Road, Covert Road, Covert Close, Compass Point, New Road, Wharf Lane, South Bank Road, Chaucer Close, Kings Road Berkhamsted, Westfield Road, Durrants Lane, Pages Croft, Haynes Mead, Bridle Way, Edlyn Close and Winston Gardens. Additionally, the hard copy directs residents to the DBC website but does not provide the full information required for a resident to a return a meaningful response.</p> <p>Northchurch has a high percentage of elderly residents who do not access information online or via social media and know little of nothing about Dacorum's plans. Many residents to not have access to the devices that they need to consult the documents and are therefore excluded. Journeys to libraries are non-essential, unlawful and cannot reasonably be advised. In normal circumstances, Northchurch parish councillors would distribute leaflets detailing the plans for Northchurch to all our households, but Lockdown rules have prevented us doing this. One example from an elderly local man illustrates the difficulties face by elderly and disabled residents:</p> <p>"I moved area in 1959 and took part in a consultation on building on the field behind Chaucer Close at that time by attending a meeting in Sunnyside Church Hall. But I have not received any information notifying me of the current consultation. I have no IT. I cannot travel to a library because I am disabled, and I live alone. I would like to participate in the consultation, but it is not possible because the current lockdown restrictions say I should only do essential journeys."</p> <p>Meaningful consultation would reveal that virtually everyone in Northchurch believes that Dacorum's Plan does not recognise Northchurch and does not meet the needs or aspirations of local people. It will undermine their quality of life,</p>

harm their physical and mental wellbeing, and cause irreparable damage to the Green Belt. Northchurch Parish Council would like this plan to be withdrawn and replaced with a new plan based on an up-to-date assessment of housing needs that reflects the views of the people of Dacorum.

In conclusion the Local Plan:

- Is unknown to many residents due to lockdown restrictions
- Is deeply unpopular with those residents who are aware of it
- Uses out-of-date, 2014 housing projections which are much higher than current projections
- Prioritises housing targets above the Green Belt, climate change, sustainability, biodiversity and public health
- Does not meet the need for social housing
- The population increase in Northchurch (over 50%) will cause overcrowding and congestion
- Will destroy 40 acres of Green Belt in Northchurch, and 21,000 acres across Dacorum
- Is not compatible with the Sustainability Appraisal
- Will damage the River Bulbourne
- Will harm the physical health and mental wellbeing of local people
- Fails to protect the distinct community, history and rural character of Northchurch
- Allows Northchurch to 'sprawl' into Berkhamsted
- Fails to maximise the use of brownfield land for housing
- Fails to provide the infrastructure needed to cope with increased demand
- Fails to provide each development with a traffic management plan

Included files

Title Question: Any other comment

ID EGS14124

Person ID 1270503

Full Name TOM RITCHIE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

<p>QUESTION ANY OTHER COMMENT comment</p>	<p>I am a long-time resident of Berkhamsted and responded to the 2017 Consultation, with comments of concern, including support of homes location option 1B. I know many fellow residents made the same choice and was surprised and disappointed that this was not reflected in the proposals on which the new consultation comments are invited.</p> <p>Please accept this letter as my only comments on the matter; I commenced the on-line version but would prefer my response to reflect only the Berkhamsted situation, which I know well.</p> <p>OVERALL POSITION</p> <p>Firstly, may I add to the many voices, who have asked DBC to abandon the current process, for the following reasons:</p> <ol style="list-style-type: none"> 1 The Covid lockdown has not allowed residents to follow fully the thousands of pages of the (at last) published data, nor to consult in any meaningful way with Planning Officers, local Councillors and other local associations. 2 This will surely result in the response levels being so low that they will not represent public comment at an acceptable sample level. 3 The huge changes in the central Government's housing number parameters make the target objectives meaningless. Worse, the current process simple allows developers to "line up" included sites for their own planned use, either inside or outside the Local Plan. <p>The argument, that the present process has cost a considerable sum, which would be wasted if abandoned, is not a good reason for continuing on the wrong path. The cost, versus parts of the Borough having a completely unacceptable planning future, are meaningless.</p>
<p>Included files</p>	
<p>Title</p>	<p>Question: Any other comment</p>
<p>ID</p>	<p>EGS14139</p>
<p>Person ID</p>	<p>1263506</p>
<p>Full Name</p>	<p>Ian Brown</p>
<p>Organisation Details</p>	
<p>Agent ID</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Yes / No * Yes * No</p>	<p>Yes</p>
<p>QUESTION ANY OTHER COMMENT comment</p>	<p>he Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border</p>

opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS14141

Person ID 1163439

Full Name Lindy Weinreb

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* **Yes**

* **No**

QUESTION ANY OTHER COMMENT comment	Before embarking on my response to the draft Local Plan, I would like to say that I feel not enough opportunity has been given to a large section of the community which could not access the IT version of the consultation. As a result of Covid 19, the community could not access the library, the Forum, or Victoria Hall, as such an outing would not have been designated as essential by HMG. Therefore, I feel that the consultation could be regarded as invalid.
Included files	
Title	Question: Any other comment
ID	EGS14157
Person ID	1270547
Full Name	Ann Lynch
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	We need more time to object in view of COVID RESTRICTIONS and ask you please help keep Tring and Berkhamsted as we all love them. There is of course good reason why people should want to live here but we must take time to consider the impact on the present residents.
Included files	
Title	Question: Any other comment
ID	EGS14178
Person ID	1270552
Full Name	Mr Michael Friend
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	I strongly object to the council completely desecrating the countryside, listed as an area of natural beauty, by building three thousand dwellings at Long Marston. Spoiling the beautiful countryside for generations to come. Please rethink this
Included files	
Title	Question: Any other comment
ID	EGS14180
Person ID	1270554
Full Name	JOHN CYSTER
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>Called me on 14 February to say he hadn't heard anything from DBC and did not have a computer. He felt it would be tragic if the built on the green belt. he said he and his wife first moved into the area in 1959 and recalled going to a meeting about proposals to build on BK-06 at that time. They objected successfully on the grounds of road access.</p> <p>Due to the CV-19 restrictions he has no way of going to a library or the Forum as he is disabled. In 2017 he attended a meeting at the Egerton Rothesay School about the development at Bearoc Park and would wish to participate in a consultation in a similar way again. He recalls that in 1959 he attended a meeting in a church hall to oppose development in BK-06.</p> <p>Consultee is concerned re the loss of the green belt - he thinks Green Belt land should not be released for development as it is precious. He is concerned about traffic congestion from over- development.</p>
Included files	
Title	Question: Any other comment

ID	EGS14181
Person ID	1270557
Full Name	DOROTHY MULLINS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>This resident contacted me on 1 February to inform me that she had not heard about the consultation. She had not received the brochure from DBC. She had a computer but was unable to find the consultation on the website. She informed me that her elderly husband had died with CV-19 and had just been buried.</p> <p>Consulted of question which was asked but she would have had the opportunity to attend public meeting. She has not read and would have accessed the consultation documents. Consultee felt unable to respond due to her recent bereavement due to CV-19.</p> <p>Her comments on the consultation were;</p> <p><i>'I have just buried my husband and I could only have 30 people at the funeral. All his friends could not say goodbye to him, so how can they do this during the lockdown. We weren't even allowed to sing at his funeral.'</i></p>
Included files	
Title	Question: Any other comment
ID	EGS14197
Person ID	1253654
Full Name	Jodie Bell
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>want to state my absolute objection to the Emerging Local Plan. It is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy.</p> <p>Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation..</p>
Included files	
Title	Question: Any other comment
ID	EGS14204
Person ID	1264035
Full Name	Alex Knowles
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Finally I have attached a photo showing 2 important facts – firstly we received the Growth Strategy brochure only on Thursday 25th February – 4 days before the deadline of the consultation on the 28th February. How are we supposed to have had enough time to respond and assist others to respond to the consultation who need help with postage, the internet, access to the information etc?</p> <p>I would like to also add that the information I have tried to access over the last week since I have been made aware of this growth strategy by the community, is incredibly complicated and confusing. I have a degree and am perfectly proficient on the internet but there is a lack of clear, concise, accessible information available to the public to be able to respond constructively and with good knowledge of the proposal.</p> <p>Finally, we are in a pandemic and a 3rd lockdown. The entire population is distracted with untold physical and mental health problems with hundreds of thousands also shielding with no access to family, friends and community that they usually would be able to learn about this from.</p> <p>It is therefore immoral to push a consultation through during such unprecedented times and urge you to stop the consultation. The statistics and figures need to be re-looked at, presented accurately and brought forward at a time when we are not in a national crisis.</p>
Included files	
Title	Question: Any other comment
ID	EGS14225
Person ID	1270581
Full Name	MR & MRS DUNCAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

* Yes	
* No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS14231
Person ID	1270582
Full Name	NADIA LUPO
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes
* Yes	

* No	
QUESTION ANY OTHER COMMENT comment	I object to the way this consultation has been conducted during a national lockdown. - Many people still do not know about it. - People without access to IT are excluded. - People have not been told they can send a handwritten response by post. - There has been inadequate publicity
Included files	
Title	Question: Any other comment
ID	EGS14234
Person ID	1145687
Full Name	Mrs Polly Walker
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I feel there has been a deliberate lack of consultation of the development plans within the local community. Barriers have been created by the national lockdowns in terms of information relating to the proposals being readily accessible – especially to the elderly and vulnerable members of the community – and this has not been taken into account. Those that are not digitally competent or able to access means of digital communication have been restricted in their opportunities to express their views – surely this compromises the Dacorum Borough Council commitment to equal opportunities and inclusivity?
Included files	
Title	Question: Any other comment
ID	EGS14238
Person ID	1264711
Full Name	Timothy Symington
Organisation Details	
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>It appears that this Plan is the result of:</p> <p>a) a national policy that uses outdated population growth statistics and an algorithm to calculate a housing quota far above the actual requirement for new housing in the area and</p> <p>b) a local policy of developer-led housing developments.</p> <p>Together these policies result in proposals to develop enormous tracts of Green Belt land with expensive, low density housing that is profitable for the developers but is comparatively much less sustainable than its urban equivalent.</p> <p>The Plans provide a way to meet a centrally set quota - but at enormous social and environmental cost to the residents of Dacorum who will see ancient towns like Tring and Berkhamsted altered forever.</p> <p>Meanwhile the real problem - the shortage of genuinely affordable housing and/or social housing remains unsolved.</p>
Included files	
Title	Question: Any other comment
ID	EGS14240
Person ID	1270586
Full Name	RACHEL CHAPMAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Incidentally I received "The Dacorum Local Plan 2020 to 2038" pamphlet in the post today. Rather late in the day. It certainly doesn't give us, the residents, that much time to formulate our objections!!!!
Included files	

Title	Question: Any other comment	
ID	EGS14266	
Person ID	1270624	
Full Name	ROD MACGILLIVRAY	
Organisation Details		
Agent ID		
Agent Full Name		
Agent Organisation		
Yes / No * Yes * No	Yes	
QUESTION ANY OTHER COMMENT comment	1	<p>Introduction</p> <ul style="list-style-type: none"> • The Local Plan document has been published for consultation under the Regulation 18 of the Local Plan Regulations (England) • This paper sets out my response to the consultation • It is acknowledged that a substantial amount of work has gone into the production of this draft Local Plan and all involved must be commended on the volume of work However it is considered that the draft Local Plan contains fundamental flaws in both the input premises (particularly with regards to the analysis of housing need for the period covered by the draft Plan) and in the analysis regarding sustainability, the site selection process, and the lack of a comprehensive infrastructure plan. • With the current government's drive to 'simplify' the planning process through a zoning approach, sites which fall within a zoning of presumed development would have a simpler and smoother path through to planning This makes it imperative to 'get the Local Plan right', as an ill-conceived Local Plan will result in poor development choices and decisions which will adversely impact generations to come far into the future. • We therefore have a duty of care to evaluate and critique this Local Plan thoroughly. It is in that spirit that the following comments are I trust that these very serious concerns will be treated with the gravity they deserve.

- The draft local plan is a substantial piece of work which has been produced by teams working over many years. It is neither reasonable nor realistic to expect consultees to comprehensively study and respond to this full body of work in the very short time allowed for this consultation. My comments therefore focus on and are limited to the key aspects of housing need, the site location analysis, sustainability (particularly with regards to the proposed location of new housing development) and transport. This is not to say that I support or disagree with all the other components of the plan. It is merely a reflection of what has been possible for me to evaluate in the limited time
- As a resident of a small hamlet immediately north of Hemel Hempstead, my comments focus on the influence and impacts that the draft local plan will have on both the countryside and the town of Hemel Hempstead.
- I am a resident and homeowner within the borough of Dacorum
- (personal detail removed)
- (personal detail removed)
- This Local Plan proposes a growth in housing need that is not supported by the latest statistical evidence. The proposed growth is therefore questioned and needs to be reviewed and revised. The revision to the growth in housing need should be properly supported by the latest scientific and statistical evidence.
- Understandably the Local Plan makes no allowance for the potentially considerable long-term effects of the coronavirus pandemic. These impacts could be substantial and long-lasting, and need to be better understood and accommodated, otherwise the Local Plan will cause ill-conceived outcomes.
- The Local Plan must be strategic in nature. This requires that it drives for the growth in housing development to be located in the **best** places from town and transport planning perspectives. The currently proposed Local Plan does not do this. It proposes development primarily in locations based on land that has been offered for development by private landlords or developers, with no consideration of strategic impact. The proposed locations for development are consequently often poorly located in terms of accessibility, transport and sustainability.
- The Local Plan claims as a strategic objective that it is committed to reducing carbon and greenhouse gas emissions. However the major development site locations proposed will have the opposite impact. If the Local Plan does not meet its own stated strategic objectives then it is by definition not fit for purpose
- 1 Conclusion

- (personal detail removed)
I submit that the Local Plan as drafted should be withdrawn for the following reasons, which are set out with more detail in the attached document:
-
-
- The Dacorum Local Plan (2020 – 2038) Emerging Strategy for Growth should be withdrawn for the following reasons.
- This Local Plan proposes a growth in housing need that is not supported by the latest statistical evidence. The proposed growth is therefore questioned and needs to be reviewed and revised. The revision to the growth in housing need should be properly supported by the latest scientific and statistical evidence.
- Understandably the Local Plan makes no allowance for the potentially considerable long-term effects of the coronavirus. These impacts could be substantial and long-lasting, and need to be better understood and accommodated, otherwise the Local Plan will cause ill-conceived outcomes.
- The Local Plan must be strategic in This requires that it drives for the growth in housing development to be located in the **best** places from town and transport planning perspectives. The currently proposed Local Plan does not do this. It proposes development primarily in locations based on land that has been offered for development by private landlords or developers, with no consideration of strategic impact. The proposed locations for development are consequently often poorly located in terms of accessibility, transport and sustainability.
- The Local Plan claims as a strategic objective that it is committed to reducing carbon and greenhouse gas. However the development site locations proposed will have the opposite impact. If the Local Plan does not meet its own stated strategic objectives then it is by definition not fit for purpose.

Included files

Title Question: Any other comment

ID EGS14299

Person ID 1270631

Full Name	SIMON LEGG
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	It is very difficult understanding the questions you are asking in this response document and I feel it is deliberately made overly complex, to put people off responding!
Included files	
Title	Question: Any other comment
ID	EGS14310
Person ID	1259141
Full Name	Kirsten Riemer
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure</p>

associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS14332

Person ID 1270637

Full Name TOM GROVES

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Too many houses proposed. The proposal is far greater than requirements.

Included files

Title Question: Any other comment

ID EGS14338

Person ID 1270635

Full Name Catherine Bright

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS14340
Person ID	1270640
Full Name	Geoffrey Llewellyn

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am writing to accompany my response to your consultation document and detailed comments are given below.</p> <p>By way of introduction however, I should say that I believe that the plan is misconceived, “supported” by specious arguments and makes assertions that are simply not plausible. Overall, it seems to be the result of the Council’s desire to curry favour with the Government by showing commitment to the execution of a central plan worthy of a Soviet Union regional apparatchik!</p> <p>The lack of joined-up thinking in connection with health provision is lamentable as is the failure to give proper consideration to the infrastructure issues that would attend the plan’s execution. Moreover, the track record of the Council in obliging private sector developers to contribute appropriately to the sustainability and amenity of the Berkhamsted community provides no re-assurance that the “upsides” of investment in the area will ever be delivered.</p>
Included files	
Title	Question: Any other comment
ID	EGS14342
Person ID	1270640
Full Name	Geoffrey Llewellyn
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>Lack of Proper Consultation</p> <p>To begin with I want to protest at the way this consultation has been conducted. My household has not received ANY communication from the Council about this Plan. No doubt because of the pandemic, there has been no public display or model showing housing or traffic movements consequent to the Plan. Despite a woeful lack of public engagement, the Council has pressed ahead with a process in a way which could be construed as avoiding public scrutiny. It is Putinesque and would probably be wide open to legal challenge.</p>
Included files	
Title	Question: Any other comment
ID	EGS14369
Person ID	1270640
Full Name	Geoffrey Llewellyn
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>As I said at the beginning of my comments, DBC have failed miserably to consult adequately about any of this Plan and the pandemic cannot be regarded as an excuse for not contacting every household about proposals which have such a major impact on their communities and quality of life.</p> <p>DBC have not engaged with BRAG in recent years even though they worked closely on the Core Strategy and the Public Enquiry. They do not reply to emails. As I know myself.</p> <p>This is not a council that is responsive or one that listens.</p>
Included files	
Title	Question: Any other comment
ID	EGS14385
Person ID	1270640
Full Name	Geoffrey Llewellyn
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I support everything said by the One Voice Alliance. I consider that there should be a moratorium on any further significant in housebuilding until the Borough has a healthcare system that is at least on a par with the national average and can then accommodate an increase in the population, and until there is a proper sustainable water and sewerage infrastructure that does not involve the desiccation of the local chalk streams and a cessation of our water supply in the summer months.
Included files	
Title	Question: Any other comment
ID	EGS14410
Person ID	1270653
Full Name	NEIL BRANCH
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	have concerns that the consultation period needs to be extended to allow all the residents to express their concerns. given the situation we have found ourselves in during the pandemic, and adhering to the rules laid down by Government, the oppurtunity to discuss with fellow residents the proposals and indeed share opinion has been severely restricted due to the lack of social interaction. Through my own experience i have spoken to friends who are aware of the proposals but are not however aware of the extent of the proposals, and i'm sure i'm not alone in this experience. Covid restrictions have prevented door to door, or on street canvassing to engage and inform residents of the proposals, and also prevented attending Council meetings, people meeting, discussing and considering responses to the local plan.

a considerable extension of the consultation period should be applied to allow full consideration by Dacorum residents of the impact of the proposals

Included files

Title Question: Any other comment

ID EGS14412

Person ID 1270654

Full Name RICHARD WALL

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Whilst appreciating the extension of the deadline to end February 2021, this is nevertheless an extraordinary time in which to be consulting on developments so fundamental to the future of the town. People's focus is elsewhere while the COVID pandemic continues, and almost the entirety of the extension period has coincided with the 3rd lockdown - people with young families are having to juggle work, home-schooling and additional emotional support for our little ones and find themselves with very little time. I am someone who takes a great interest in local matters and is motivated to respond to such consultations, but even I am still responding in what are literally the last hours of the consultation being open. I fear many people are simply not aware or too exhausted to contribute. I urge the council to reconsider its consultation timescales further

Included files

Title Question: Any other comment

ID EGS14443

Person ID 1270665

Full Name Cllr Stephen Cloughton

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The Council has insisted on proceeding with this consultation during the Covid-19 pandemic and has refused to rethink its approach or even extend consultation other than for a limited period. Not only has this made it difficult for many people to respond properly to the consultation, but it also means that the Council is consulting on proposals that will immediately become out of date, given the major changes to lifestyle and work patterns that are likely to result from the pandemic. The validity of this exercise is highly doubtful.
Included files	
Title	Question: Any other comment
ID	EGS14447
Person ID	1270667
Full Name	Cllr Lyn Hyde
Organisation Details	Little Gaddesden Parish Council
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	NOT FIT FOR PURPOSE It was generally felt that Consultation Comments Form response mechanism to the Emerging Plan Strategy was made purposely difficult to deter negative response to the plan. Below just a taster of the problems Parishioners have reported to me about the difficulties they have had in responding to the consultation. Other Parish Councillors had similar comment made to them. I had to resort to (name removed) in the Strategic Planning Team to get my response in. Whoever set up the 'Consultation Comments Form' did a very poor job and a great disservice to our Parishioners who ended up frustrated and furious in turn. Extremely concerned at the hurdles put in the way to HAVE YOUR SAY!

Parishioner comments cut & pasted from their emails to me:

I wonder whether Dacorum are hoping that people will just die on active service while attempting to respond to their proposals?!

Just to report that I have spent the evening fighting with the wretched keystone@objective.com version of the Dacorum Plan objections “form”. I prepared my answers in Word first – thank heavens. The website document was a complete nightmare to navigate and, interestingly, the wording of some of the relevant points (e.g. about the possible new road) was different on the website blurb from the version in the pdf document on Dacorum’s website...

Anyway, tis done – including telling them about 4 times that they should have used the 2018 ONS statistics.

Did my bit on the Local Plan – their format doesn’t make it easy does it!

You may want to try sending your message again to see if the problem was only temporary.

DNS for host dacorm.gov.uk is mis-configured.

The following recipients did not receive this message:

<responses@dacorm.gov.uk>

Included files

Title Question: Any other comment

ID EGS14509

Person ID 1270685

Full Name Ms Jan Kerry

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS14519

Person ID 1270383

Full Name Mr Nigel Kerry

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No
* Yes

* No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS14535
Person ID	1270690
Full Name	Akzo Nobel CIF Nominees Ltd
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	

Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Our client is supportive of DBC seeking to meet its housing needs through the new Local Plan. DBC cannot currently demonstrate a Five Year Housing Land Supply as confirmed by a recent appeal decision². Moreover, the Council's HDT 2020 (January 2021) score of 89%, further highlights problems with housing delivery rates and the requirement for an Action Plan to help boost housing delivery. Factoring in these considerations and past housing delivery issues, the Council should identify additional urban sites in Berkhamsted for new housing in the Regulation 19 Local Plan, including Land at 168-192 High Street, Berkhamsted.</p> <p>The Council should also adopt a more flexible approach to density should be taken, whilst also ensuring that land is optimised in accordance with paragraph 122 of the NPPF. This will ensure the Plan has been "positively prepared" and the housing strategy is robust in accordance with paragraph 35(a) of the NPPF.</p>
Included files	
Title	Question: Any other comment
ID	EGS14545
Person ID	1163978
Full Name	John Wignall
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p>

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring {Tr02 and Tr03}.

Included files

Title Question: Any other comment

ID EGS14576

Person ID 1270700

Full Name Mr Peter Sims

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

This plan will not allow Dacorum to meet it's climate targets, neither will it half biodiversity collapse. Most importantly the house building it proposes will not lead to improvements in quality of life or happiness for dacorum's inhabitation, either now or in the future. The is a local plan to allow developers to make large amount of money at the expense of the population. Dacorum council has declared a climate Emergency since the local plan process was initiated and therefore

needs to go back to the drawing board. It urgently needs a overarching zero carbon and sustainability strategy to outline how it can fulfil its obligations under its own Climate Emergency declaration and the national zero carbon targets. Then in light of this it should review its currently local plan in light of this new overarching strategy, which will likely be found to be inadequate. Dacorum therefore will need a new Climate Emergency local plan covering the next 10 years of the transition. For such a response to an appropriate emergency response to the urgency outlined in its climate emergency declaration both these steps need to be completed in the next two years, and all other priorities should go on hold until overarching zero carbon and sustainability strategy is in place. Evidence that climate change and biodiversity loss are emergencies:

<https://www.ipcc.ch/sr15/>

<https://www.ipbes.net/news/Media-Release-Global-Assessment>

The following clarifies UK's obligations within IPCC 1.5C carbon budgets, and that only path way one is a viable and safe option for humanity.

<https://www.cusp.ac.uk/themes/aetw/zero-carbon-sooner/>

Evidence that responding to emergencies requires not just putting something on the agenda, but taking everything else off the agenda and reviewing how it fits in with this new pressing issue.

https://www.greenhousethinktank.org/uploads/4/8/3/2/48324387/climate_emergency_plan_that_fu_cr_may20.pdf

Resources clarifying implications of the above for how our economy and governments (both locally and nationally should respond:

<https://www.greenhousethinktank.org/climate-jobs.html>

<https://www.greenhousethinktank.org/climate-emergency-economy.html>

<https://cat.org.uk/info-resources/zero-carbon-britain/research-reports/> <https://ukfires.org/absolute-zero/>

Due to urgency of response require and all encompassing nature of transition that is needed, it is highly recommended that council commission a citizen's assembly to shape the overarching strategy and then the subsequent emergency local plan:

<https://extinctionrebellion.uk/wp-content/uploads/2019/06/The-Extinction-Rebellion-Guide-to-Citizen-Assemblies-Version-1.1-25-June-2019.pdf>

Included files	
Title	Question: Any other comment

ID	EGS14596
Person ID	1270707
Full Name	Ms Debbie Wilson
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Additionally, some people that I know received a leaflet through the door regarding the local plan. However, an equal amount of people I spoke to did not receive this - it is suggested this is picked up with your distribution company!
Included files	
Title	Question: Any other comment
ID	EGS14603
Person ID	1270709
Full Name	Mr Rodney Tucker
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Having lived in this town my entire life I have witnesses the removal and deconstruction of practically all of the best adult/family entertainment venues in this town - the Pavillion, countless pubs that hosted live music as well as social clubs, nightclubs, bars, arcades, swimming centres, bowling, pool halls, Quasar, and many others. To compound this, the population has grown significantly already and the residents are feeling it.

Not planning to provide social activities for residents is highly detrimental to people's mental, physical and social health. Planning to increase the population of the borough by an additional 50,000+ people without planning for these improvements will compound this issue even further. Residents need to be provided with a wide variety of options for things to do. There's only so many times you can go for a meal and head to the cinema.

High streets should no longer be focused purely on shopping, which is being driven out by online shopping, and instead should offer a range of entertainment venues for residents. This will provide jobs and bring high streets to life. Entertainment venues should be suitably sized. The Old Town Hall has a capacity of around 100 people. This is not suitable to cater for a growing town which will soon have a population to rival cities. Entertainment venues can cater for local groups such as amateur dramatics, local music festivals, open mic nights and then have the potential to draw in larger acts in terms of comedians, musicians and bands, theatre productions, etc.

After COVID, people will be craving and valuing these facilities more than ever before.

Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite.

Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced.

Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.

All new buildings should be designed to meet the highest externally certified sustainability standards and to be at least net-zero carbon (including Scope 3 emissions). Examples include: Every property with a parking space to have an electric vehicle charger built into it. Every property to have a dual aspect to allow for natural ventilation. All new homes must incorporate solar PVs and other appropriate sustainable sources. No new building should be directly reliant on fossil fuels for heating (i.e. no gas boilers) and each home should collect rain water for toilets and store and re-use grey water. The homes must have top class insulation. These standards should be mandatory for all developers in the Local Plan.

- The 40% minimum affordable homes objective should be enforced across the Too often developers in the past have been allowed to waive their affordable homes commitments.
- Trees and woodland are very valuable to the environment and the community's physical and mental I welcome the commitment in the plan to retain existing trees but in order to compensate for any removal of green belt it is

vital that we seek a commitment that new mixed woodland and re-wilding, with public access, be planted close to, and be integral to, any new major development area.

- An increase in habitat for wildlife must be incorporated into any green field development areas including wildlife
- Recreational corridors should be incorporated within new built-up areas to promote cycling and pedestrian access through the development and provide connectivity with the existing town and the countryside These routes should not be limited to narrow, dark alleyways but should be several metres wide with natural vegetation to make travelling pleasantly airy and to support bio-diversity.
- The Local Plan should allocate land for new allotments for resident of new homes as well as laying out gardens to support 'Growing your own'(which is both sustainable and good for mental health)
- Public transport must be greatly improved both to connect these new homes to their town centres but also to reduce traffic congestion on the roads which cannot be Well connected and maintained dedicated cycle routes throughout our towns must be implemented along with secure bike storage.

Additionally, some people that I know received a leaflet through the door regarding the local plan. However, an equal amount of people I spoke to did not receive this - it is suggested this is picked up with your distribution company!

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Title Question: Any other comment

ID EGS14610

Person ID 1270714

Full Name Mr Kevin kelly

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

**QUESTION ANY OTHER
COMMENT comment**

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Included files

Title Question: Any other comment

ID EGS14633

Person ID 1270729

Full Name MR & MRS A HOUGHTON

Organisation Details

Agent ID	1270728
Agent Full Name	MS KAREN GALLEY
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	A number of factors have 'emerged' in considering the Emerging Local Plan. There is requirement for further: <ul style="list-style-type: none"> - Evaluation and justification of the stated housing supply need - Appraisal of development requirements, and particularly in the light of emerging and evolving business and social needs as a result of Covid-19 - Exploration and assessment of opportunities for delivery of need within existing settlement boundaries - Cross border enquiry and collaboration in servicing needs - Clarification of exceptional need for allocation of Green Belt land – an irreplaceable resource - cited as being 'best and most versatile' agricultural land
Included files	
Title	Question: Any other comment
ID	EGS14643
Person ID	1270731
Full Name	MRS JOAN EELEY
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border

opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

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Included files

Title Question: Any other comment

ID EGS14653

Person ID 1265051

Full Name Edmund Knox

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* **Yes**
* **No**

QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS14660
Person ID	1270736
Full Name	WENDY STEPHENS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes	Yes

* No	
QUESTION ANY OTHER COMMENT comment	<p>I would like to respond to your local plan by saying I am NOT in favour of it.</p> <p>From what I have read the figures on the number of houses seem to be based on research done before the pandemic and based on old totals.</p> <p>At the very least I would respectfully ask that you delay any progress or decisions until after the pandemic when more people will have time to read through the plans in detail.</p> <p>Almost every adult with children is currently trying to homeschool or work hard to keep their existing roof over their head. They simply do not have the luxury of the time to sit and read a multiple page booklet regarding something that hasn't been thought through well at all.</p> <p>Now is not the time to try and rush any decisions through.</p> <p>If you have any kind of mailing list regarding any follow ups to this area plan, then please do add me to that list or at the least consider this as an option going forward.</p>
Included files	
Title	Question: Any other comment
ID	EGS14671
Person ID	860814
Full Name	Mrs Clare Joyce
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I also fully endorse the submission of "Grove Field Residents", BRAG and "One Voice" alliance,
Included files	
Title	Question: Any other comment
ID	EGS14672
Person ID	1270737

Full Name	TAMMY WILSON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I am writing to you today to request that you extend the consultation period, at least until you've actually notified those that are going to be most impacted.</p> <p>I have only found out through Facebook that you intend to build a gigantic new estate within 200m from my home. You appear to have sent a leaflet explaining this to some residences in Hemel Hempstead but you have not sent it to many households, it looks like this may be intentional? My neighbours have not received anything either.</p> <p>This consultation period needs to extend beyond the period of notifying the households surely?? Not everyone has the internet, let alone Facebook. I cannot believe this is the approach you are taking.</p> <p>I'm very disappointed in how this is being handled. After the way the conservative government has handled covid, it's handing out of contracts to unqualified pals, etc etc I'm not surprised that this is being handled in such a way, but it's wrong.</p> <p>Please can you send me and the rest of Hemel Hempstead the necessary information about your intended plans. So we know exactly where you're allowing this unprecedented amount of homes to be built. Please also detail the changes to the current infrastructure to allow for this huge increase. I assume this means we must be now keeping our hospital? New roads? New schools and doctors?</p> <p>Will these home be affordable? When I say affordable I mean affordable to 95% of the population not on 100k+ per year.</p>
Included files	
Title	Question: Any other comment
ID	EGS14687

Person ID	1270739
Full Name	HELEN OSBORNE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment

ID	EGS14697
Person ID	1270740
Full Name	JOHN OSBORNE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	

Title	Question: Any other comment
ID	EGS14709
Person ID	1270752
Full Name	DOUGLAS CANNON
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein</p>

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Included files

Title Question: Any other comment

ID EGS14721

Person ID 1270753

Full Name ANNE PIKE

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS14778

Person ID 1270760

Full Name LQ Estates

Organisation Details LQ Estates

Agent ID 1270759

Agent Full Name Miss
Hanna
Mawson

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION ANY OTHER COMMENT comment

9.0 These representations are made by Pegasus Group, on behalf of L&Q Estates, in response to the Dacorum Local Plan Emerging Strategy for Growth (2020- 2038) Regulation 18 Consultation. This representation relates to Land at New Mill, Tring, identified as proposed allocation (Tr03) in the emerging Plan.

9.1 L&Q Estates broadly support the emerging Plan and consider the Vision, spatial strategy and delivery strategy form a coherent basis for the Plan.

9.2 As set out above, the housing requirement should be adjusted to 1,023 dwellings per annum to reflect the standard method, now confirmed as retained by the Government. The approach of apportioning growth to the three main settlements along with larger villages is supported as a sustainable approach.

9.3 The Plan and accompanying evidence base have set out the exceptional circumstances for releasing land from the Green Belt. This is supported and Land at New Mill, Tring forms part of that justified release. L&Q Estates are keen to work with the Council as the evidence base develops, in particular to input into viability work as per the National Planning Practice Guidance.

9.4 Land at New Mill, Tring has been demonstrated as a highly sustainable location for development. The site represents a logical extension of the market town of Tring and complements the proposed allocation East of Tring (Tr01). Land at

New Mill has the ability to accommodate a significant proportion of the future housing needs of the area. It should therefore be released from the Green Belt for development.

9.5 Land at New Mill has been demonstrated to represent a suitable site to deliver approximately 400 dwellings having regard to the Council's evidence base and technical work undertaken on behalf of L&Q Estates which accompanies this representation.

9.6 L&Q Estates confirm that they have an interest in land at New Mill and it is their intention to bring forward development within the next five years. This would support delivery of housing in the early part of the Plan period while larger sites with longer lead-in times will follow.

9.7 This representation has set out how Land at New Mill is suitable, achievable and available for development. The site is therefore deliverable in the context of paragraph 73 of the NPPF.

9.8 Overall, it is considered that the proposed allocation of Land at New Mill and its removal from the Green Belt meets the tests of soundness, as set out at paragraph 35 of the NPPF.

Included files

Title Question: Any other comment

ID EGS14791

Person ID 1142710

Full Name Mr Chris Stoneman

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION ANY OTHER COMMENT comment

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Included files

Title Question: Any other comment

ID EGS14802

Person ID 1270798

Full Name SAYED BEL-BAROO

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation .of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure

associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS14803

Person ID 1264510

Full Name Martin Evening

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

1. The timing of this consultation during a worldwide pandemic and national lockdown has disenfranchised the public. In particular, not allowing full access to the many people who do not have internet access. The DLP document is too large to access and navigate on mobile devices, which is what the majority of the public will be using to view.

The only other available option is to make an appointment to visit the library to see the documents. However, our government has told the public to 'Stay at Home to Save Lives'. Few will choose to risk their lives by booking in to view the DLP at the library.

Included files

Title	Question: Any other comment
ID	EGS14819
Person ID	1270802
Full Name	Mr Edward Blogg
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Bulbourne is threatened by low flows and a recent Environment Agency study has concluded that unsustainable levels of abstraction for public water supply are contributing to low flows, and abstraction reductions have been proposed. In the summer of 2019 one leaking canal lock gate, at Lock 48, at Dudswell wasted 2.7 mega litres a day. That is equivalent to the daily use of water by the whole of Berkhamsted. The Bulbourne water quality is deteriorating, despite attempts at improving it. How will any development on this river help the river and all the natural wildlife surrounding it? I strongly object to any building work that mean the loss of such an extent of wildlife that includes Herons, Egrets, foxes, kingfishers, goldfinches, deer, crayfish, minnows, hedgehogs, squirrels and robins.</p> <p>Hedgehogs are classified by ICUN as vulnerable to extinction. They are protected in the UK under the Wildlife and Countryside Act, 1981; Priority Species under the UK Post-2010 Biodiversity Framework and the IUCN Red List for British Mammals. This sighting is now lodged on the Herts Environmental Records Centre database.</p> <p>As a chalk river, the River Bulbourne is of international significance and it falls into the category of a priority habitat under the Natural Environment & Rural Communities Act 2006 (S41). Many species living in it and along the banks rely on a sustained flow of water which is normal in a natural chalk stream fed partly by underground springs like the Bulbourne. A recent case study by 1S. Wilson provides evidence that the Rivers Bulbourne and Gade no longer behave as chalk streams should. He demonstrates that rapid rise and fall in the water levels are more typical of urban run-off than chalk streams and he observed flooding. Surface water running off hard-standing (roads, paths, rooftops, etc) is rapidly directed via drains into these rivers during periods of medium and high rainfall causing the water levels to quickly rise and fall. What should be clear water often becomes cloudy due to silt, rubbish and pollutants. Progressive silting and growth of vegetation in the water channels reduce the flow of water and increase the risk of flooding. - Will buildings and roads increase the probability of damage to the river ecosystem and some homes being flooded? As these rivers are of global</p>

significance, should the Local Plan incorporate measures to restore and protect them? Dacorum Borough Council have a duty to have due regard to the conservation of biodiversity under the Natural Environment and Rural Communities Act 2006 (S40). Those habitats and species which are of principal importance for the conservation of biodiversity in England are listed in Section 41 and include the House Sparrow, Cinnabar Moth and Great Crested Newt. s biodiversity likely to be increased, or diminished at the proposed development sites? What specific biodiversity, green infrastructure or compensating measures do you think should be recognised in the various site plans? Are Local Authority measures in place to ensure that developers adhere to a development plan after Planning Permission is granted and before any long-term biodiversity damage occurs?

Bank Mill Lane has only a handful of cottages - several listed buildings - and already there are traffic issues with cars overflowing from the Old Mill pub. There have been several near collisions on a road that is only wide enough for one car to drive down - and really should be one way. How will this road and indeed the bridge to Bank Mill sustain more cars and people? I can safely predict there would be deaths if this were to be the case.

Investment funds are being allocated to Hemel Hempstead for transport and amenity requirements associated with expansion of the town. Equivalent financial and infrastructure support is not being given to Berkhamsted and Tring.

I think the number of proposed developments across Dacorum is excessive and question the formula used to calculate it....

I am also concerned about families with sick children or elderly and disabled people trying to get to the Gossom's Road surgery where there is already inadequate parking? Trying to see a doctor prior to the pandemic was a near impossibility - how will the town cope with a huge influx of people, when there are already many elderly people living here who will need access to their local GP? Are we to simply never get to see a doctor as there will not be enough GPs to care for that many people...

I am deeply concerned about the strong Countryside / Green Belt boundary Impact on valley sides and important dry valley location.

Also I am worried about the encroachment of the urban area along the valley bottom and adjoining open countryside. Also the distance to town centre services and facilities, employment, land and station.

Included files

Title

Question: Any other comment

ID	EGS14831
Person ID	1270804
Full Name	Dr Jessica Field
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	

Title	Question: Any other comment
ID	EGS14860
Person ID	1265016
Full Name	Charles Aylwin
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>To summarise, our concerns are:</p> <ol style="list-style-type: none"> 1 The potential development north of Long Marston cricket ground, west of Cheddington Lane & north of Station Road in Long Marston would be disastrous for the local area. 2 The very significant expansion of hosing provision in Tring (underway now, with more proposed) with no corresponding investment in local schools, medical facilities and local infrastructure.
Included files	
Title	Question: Any other comment
ID	EGS14904
Person ID	1144629
Full Name	Mrs SOPHIE LAWRANCE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment

In addition to the comments above I believe that the consultation process has been inadequate.

The Plan (if adopted) will be in place for close to 20 years and represents housing growth across the borough of c.25%. Yet DBC has decided to rush through the consultation during a period of national lockdown which has made it impossible to promote proper awareness of the radical change to planning policy in the borough. During the previous consultation on the Issues and Options paper (2017), it was possible to engage directly with other residents in Northchurch to ensure that they were aware of the consultation (and this happened). That has obviously not been possible in the current situation. Nor does DBC appear to have publicised the consultation other than online: for example, no written materials referring to the consultation have been received at addresses directly alongside BK06, one of the locations slated for major development.

By contrast, in October 2020, Buckinghamshire Council withdrew the Chiltern and South Bucks local plan in part due to Covid-19, noting that a revised plan would be drawn up to "*reflect the considerable effect Covid-19 has had on areas such as shopping habits and town centres as well as changes to planning law*".¹¹¹ DBC's decision to push ahead with a draft plan in circumstances where, as the government has stated "*the way that the country lives, works and travels continues to change more rapidly than at any time since the war*", appears misguided, both from the perspective of ensuring that a proper consultation takes place, and from the perspective of the need to address the changes wrought on residents' way of life, and consequently our planning needs, by the pandemic.¹¹² As the government notes, "*This has implications, for example, on demand for commercial and retail floorspace in our cities and urban areas. We want our towns and cities to emerge from the pandemic renewed and strengthened – more beautiful, more healthy, more environmentally sustainable and more neighbourly places, with greater public and private investment in urban housing and regeneration*".¹¹³

The Plan and the associated evidence base comprises thousands of pages of material, and is not easily accessible even online, given the volume of material. That difficulty is exacerbated by the fact of home schooling (with households having limited access to devices, as well as the additional responsibilities that entails), and the stress and distraction caused by the overall situation.

These factors mean that the plan, and the consultation on it, can both be regarded as fundamentally flawed. In the circumstances, it is highly unlikely that the Plan is fit for purpose in view of likely social changes as a result of the pandemic, and any public response to the Plan is unlikely to be fully reflective of local views.

Conclusion

Residents have every reason to be outraged by the proposed Local Plan, which rides roughshod over legal protections for the Green Belt and the AONB, and will be hugely harmful for local quality of life. It is difficult to avoid the conclusion that DBC has (wrongly) treated the current government's aspirations to increase the national housing stock as an injunction, and failed to take account of the very great weight that it is required, under national planning policy, to give to the protection of the Green Belt and the AONB, for the benefit of current residents of the borough and indeed future generations.

The type of housing proposed is no doubt very 'viable' (a euphemism for profitable for developers), but is not the sort of development that DBC should be promoting - namely, to provide affordable accommodation within genuine walking distance of town centres. The fact that the consultation has been rolled out in a time of national lockdown, when national planning requirements are in a state of disarray, and in a time of huge social change that is likely to impact on the pattern and extent of housing need over the coming years, is also to be regretted.

The amount of work that has gone into the proposed Local Plan is obvious, and it is by no means the case that DBC needs to start again from scratch. There are many good things in the proposed plan. However, as a whole, the proposed plan is not fit for purpose. There are serious issues with the consultation process, the determination of local housing need, and the question of the extent to which it is realistic to satisfy that need given the legal protections of the Green Belt and the AONB (protections which DBC has, quite wrongly, treated as being of secondary importance to the need to meet its share of the government's house building targets).

It would be of the utmost imprudence to lock in a Local Plan which results in widespread destruction of Green Belt even after more realistic figures emerge of the actual housing need. As stated in the NPPF, plans should be "*sufficiently flexible to adapt to rapid change*".¹¹⁴ Removal of land from Green Belt protection is a permanent step, which will be to the grave detriment of wildlife, current residents, and future generations. The adoption of the proposed plan would be a tragedy. It is hoped that DBC will have the courage to step back from it and think again.

111 <https://buckinghamshire.moderngov.co.uk/ieListDocuments.aspx?CIId=336&MIId=16533&Ver=4>, agenda item 7.

112 'Government response to the local housing need proposals in "Changes to the current planning system"', December 2020 (announcing decisions following planning consultation launched in August 2020) (Government December 2020 housing need consultation outcome) <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>

113 Government December 2020 housing need consultation outcome.

Included files	
Title	Question: Any other comment

ID	EGS14911
Person ID	1270828
Full Name	Owen Ellander
Organisation Details	Head of Property Development Greene King Brewing and Retailing Ltd
Agent ID	1270829
Agent Full Name	Mrs Helen Binns
Agent Organisation	Walsingham Planning
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>We are instructed by Greene King Brewing and Retailing Limited to make representations on their behalf to the Dacorum Local Plan (2020-2038): Emerging Strategy for Growth. Specifically, we write with reference to land to the north of the Red Lion Public House on London Road, Hemel Hempstead. These representations request (1) the land is removed from the Green Belt and (2) the land is allocated a Growth Area for housing in the emerging Local Plan. A plan identifying the land in question is contained with this letter.</p> <p>At the outset, the Council's attention is drawn to the lack of clarity concerning the subject site and its designation on the draft Proposals Map. In particular, it is not clear whether the site is within or outside of the settlement boundary. The draft Proposals Map appears to show the site both within the settlement boundary of Hemel Hempstead and within the Green Belt with the two designations conflicting with one another.</p> <p>It is our view that the site should unquestionably lie within the defined settlement boundary of Hemel Hempstead. However, in the absence of clarity, this letter explains why we consider the site should <u>not</u> be within the Green Belt and why it should be allocated for housing.</p> <p><u>Site</u></p> <p>The site comprises an irregular shaped parcel of land that extends to an area of circa 1 hectare. It is located to the east of A4251 London Road, to the north of Nash Mills Lane and the Red Lion Public House, to the west of the River Bulbourne / Grand Union Canal and a recent residential development and to the south of an employment area. The site is generally flat and is considered suitable for development.</p> <p>Although the site appears within the Green Belt, it does not serve any of the five purposes for including land within the Green Belt. It is also entirely disconnected from the open countryside. Indeed, the site is most accurately described as an edge of urban area undeveloped greenfield infill site. There is in our view therefore no planning basis for the site being within the Green Belt and not being available for development, particularly given the current pressure and demand</p>

for land to meet future development needs within the main urban areas and particularly Hemel Hempstead. The site directly abuts employment development to the north and residential development to the east and a public house to the south. The wider area around the site is mixed in nature comprising a mix of residential, employment and commercial and retail uses. The site is in a highly sustainable location and accessible by a range of non-car modes of transport. It is also accessible to a range of local services and facilities and employment opportunities.

The site is entirely in the ownership of Greene King Brewing and Retailing Ltd and is not subject to any existing leases. It is not in an existing active use and thus is available for immediate development subject to the necessary the planning permission being achieved. Having regard to the location of the site on the edge of main urban area of Hemel Hempstead, it is considered a suitable and appropriate site for accommodating future development needs. Whilst the site is subject to a number of constraints, they are not considered insurmountable or barriers to the development of the site. The land thus represents a viable and entirely deliverable development opportunity.

Included files	Site Location Plan.pdf
Title	Question: Any other comment
ID	EGS14913
Person ID	1270836
Full Name	Tully Children's Fund
Organisation Details	Tully Children's Fund
Agent ID	1270837
Agent Full Name	Sav Patel
Agent Organisation	Associate Director Strutt & Parker
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Strutt & Parker have been instructed to submit representations on the Council's emerging growth strategy for the Dacorum Local Plan, on behalf of the Tully Children's Fund (TCF). The TCF owns land in Flamstead which is considered suitable for housing development and should be allocated for development as part of the emerging Local Plan.</p> <p>Dacorum Council is in the process of preparing a new Local Plan for the period 2020- Once adopted, the new Dacorum Local Plan will replace the Site Allocations Development Plan Document (2016), Core Strategy (2013) and 'saved policies' from the Dacorum Borough Local Plan (2004).</p>

This representation seeks to object to the proposed growth strategy in the emerging Local Plan which focuses on providing housing in a handful of locations. This loses sight of the significant role that villages such as Flamstead could make in facilitating growth on small and medium size sites. The National Planning Policy Framework (NPPF) supports the promotion of sustainable development in rural areas which is considered to be vital in survival of local services. The representation therefore also seeks to support growth in villages with small to medium size allocations.

Growth should be more evenly dispersed in order to achieve sustainable development in terms of minimising the inflation of house prices (creating hotspots), sustaining local businesses, creating inclusive and mixed communities, reducing the impact on the AONB, and mitigating climate change.

The NPPF states that there should be a presumption in favour of sustainable development in the plan making process. This means positively seeking opportunities to meet the development needs of an area and be sufficiently flexible to adapt to change. One of the key objectives for plan making is that plans should be aspirational but Positively prepared plans with feasible deliverability strategies are key tests of soundness.

The emerging Local Plan and the growth area policies are considered to be unsound, as it is not positively prepared or deliverable, which we will expand upon in further detail within this representation.

The allocation of large Growth Areas is not the most appropriate strategy when considered against the alternatives. The allocations are inappropriate in size and situated within unsuitable locations. The focus should be on the ability to deliver a higher number of smaller to medium sized sites that are capable of being delivered in the short to medium term.

Further consideration needs to be given to the housing need within Dacorum, such as accounting for the likely change to homeworking and increase in online shopping as a result of the COVID-19. This is likely to result in more demand for new housing throughout the Borough instead of a handful of large growth areas. A key objective of the Emerging Strategy for Growth (ESG) is to deliver balanced, mixed, and inclusive communities, and to give existing communities genuine access to a wide range of high- quality and affordable homes in locations where people want to live.

It is our strong view that the Growth Areas strategy should be removed from the plan, or at least the quantum of development reduced in the three larger allocations – namely Hemel Hempstead, Berkhamsted and Tring – in order for the ESG to be considered as The majority of the housing growth in Dacorum is tied up in these Growth Areas which is considered to be unsustainable, particularly when taking into consideration the potential changes to working and living patterns in a post-COVID environment.

Villages such as Flamstead are designated in draft Policy SP3 (Settlement Hierarchy) as ‘Small Villages within the Green Belt’ and are considered to be the least sustainable in the We also strongly oppose the wording of this policy as it does not accurately reflect the excellent and sustainable location of the village between Hemel Hempstead and Markyate and its adjacency to the M1.

Flamstead is an attractive village which benefits from a range of local provisions and community facilities such as three public houses, a village shop, a petrol station with shop, a village hall, two churches – including Leonard’s, a one-thousand-year-old church that is the core of village life, a village school that serves up to 120 children, and a cricket club and accompanying sports facilities. In order to protect the viability and vitality of the village and these local services it is important to commit some proportionate level of growth.

My client's sites were put forward for housing at the Call for Site's consultation in 2015 and were considered suitable for housing subject to Green Belt considerations (designated as WA/7 and WA/8). It is unclear why these sites were not progressed further by the Council.

Included files

Title Question: Any other comment

ID EGS14939

Person ID 1270839

Full Name EMMA WELLER

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.

It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

Please don't make this decision and build on the Green Belt. This level of development for a small market town with our infrastructure is going to completely spoil the area and cause irreversible damage to wildlife and woodland areas. It is

going to have a seriously detrimental impact on the area and this decision cannot have been carefully thought through. Please reconsider.

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Please don't make this decision and build on the Green Belt. This level of development for a small market town with our infrastructure is going to completely spoil the area and cause irreversible damage to wildlife and woodland areas. It is going to have a seriously detrimental impact on the area and this decision cannot have been carefully thought through. Please reconsider.

Included files

Title Question: Any other comment

ID EGS15009

Person ID 869019

Full Name Mrs Shelley Savage

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Section 9:

The whole **area**, not just the ones specifically mentioned, should be subject to practical, not just paper-based, archaeological investigation.

2 The Brownfield site of Bovingdon Air should be developed: see question 5A.

Included files	
Title	Question: Any other comment
ID	EGS15028
Person ID	1270845
Full Name	DOMINIC LAWRENCE
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Timing of preparation of draft local plan</p> <p>It is regrettable that the decision has been taken to prepare the draft local plan during the pandemic and resultant lockdown. There are many comments in the draft Arup “Dacorum Borough Landscape Sensitivity Study” to the effect that surveyors were prevented from accessing sites due to lockdown restrictions. This clearly reduces the reliance that can be placed on this draft report, where it is addressing such sites.</p> <p>Timing and adequacy of the consultation</p> <p>It is also remarkable, and highly regrettable, that DBC has proceeded with this consultation in the current circumstances. Lockdown has made it very difficult for residents to engage in discussions and to raise awareness of the proposed plan, and it has greatly impeded the flow of information.</p> <p>A significant proportion of residents, especially those who are elderly, do not have internet access and are therefore unable to obtain access the documentation regarding the proposed plan. There is a lot of anecdotal evidence that many residents are still completely unaware of the proposals, or have become aware at such a late stage that they have been precluded, by shortage of time, from making anything other than relatively brief responses.</p>

My understanding is that a leaflet was produced by DBC and delivered to some addresses within Berkhamsted, but it appears that a relatively small proportion of residents have received it. No such leaflet was delivered to my household, in Northchurch, an area highly affected by the proposals.

Moreover, the circumstances have made it extremely challenging for residents of the borough to focus on and respond to the proposed plan. Some residents will have been affected by illness or bereavement caused by the pandemic. Others, such as NHS professionals, will have been severely overworked in the period and will have been unable to give the consultation the time that it deserves. Yet others will have been distracted by childcare requirements, due to school or nursery closures.

My view, which I know to be shared by many other residents, is that DBC's decision to press ahead with and consult on the proposed local plan, during a national health crisis and a resultant lockdown, was at best misguided. At least one other local authority has had the good sense to retract its proposed development plan in response to the uncertainty created by the pandemic, noting that it has brought "significant changes to how and where we work, future shopping needs and our town centres".[1]

DBC should recognise that its consultation has not been adequate, and take the opportunity to withdraw the proposed local plan and modify it so that it is compliant with the NPPF.

Use of "spin" in the documents

It is also disappointing that there has been some recourse to "spin" in the draft plan and supporting documents.

Examples include all the references to "West Berkhamsted", where what is meant is the area known to all of its residents as Northchurch. Northchurch is a separate parish and, although joined to Gossom's End (which is in turn joined to Berkhamsted), it has its own identity. It is regarded by many of its residents as a village. In any event, it is not "West Berkhamsted". Many Northchurch residents wonder whether the term "West Berkhamsted" has been used to attempt to justify the enormous amount of proposed development in this area, on the basis that heavy development around the fringes of a market town may look, from a planning perspective, slightly less inappropriate than heavy development around the fringes of a village.

In the context of proposed development on Green Belt land, the numerous references in the plan and supporting documents to the "creation" of "green space" are transparent and patronising "greenwashing". What is being proposed is building over most of an existing green space and allowing a small part of it to remain as a (probably unusably

small and unappealing) public park. In no sense is that the “creation” of “green space”. It is the retention of a small scrap of it.

[1] Decision made on the Chiltern and South Bucks Local Plan | Buckinghamshire Council

Included files

Title Question: Any other comment

ID EGS15051

Person ID 1250021

Full Name Hallam Land Management Ltd

Organisation Details Hallam Land Management Ltd

Agent ID 1265070

Agent Full Name Stacey Rawlings

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

A general observation is that draft plan has not been accompanied by sufficient evidence and appears rushed. There are several conflicting statements and policies that do not combine to create a clear and transparent development strategy for consultation.

HLM is concerned that the development strategy is not robust and runs the risk of being found unsound by an examiner if it were to proceed to the Regulation 19 pre-submission stage unchanged. The Council is required to show a 5YHLS, with appropriate buffer upon adoption. It is required to provide evidence that the housing trajectory is achievable and that the myriad of urban sites, particularly within Hemel, are capable of being brought forward for development by 2038 and further, that they will deliver policy compliant levels of affordable housing to meet the identified housing needs for the borough in a sustainable way.

HLM considers additional land should be included for development to ensure that the plan is sufficiently flexible to adapt to changing circumstances and potential delays in bringing forward the first phase of HGC and the urban sites.

On the basis that a key part of the evidence base for Hemel Hempstead comprising the Transport Strategies and evidence to support Hemel Garden Communities that underpins the draft Local Plan vision and proposals is currently unavailable. In light of the current shortcomings, HLM would expect a further consultation of a revised draft plan prior to finalising the

Regulation 19 draft version. The Local Development Scheme should be updated to reflect this additional stage of consultation.

Included files

Title Question: Any other comment

ID EGS15066

Person ID 1270849

Full Name Ms Jessica Lindfield

Organisation Details St William Homes LLP

Agent ID 210999

Agent Full Name Mr
Martin
Friend

Agent Organisation Director
Vincent & Gorbing

Yes / No
* Yes
* No

QUESTION ANY OTHER COMMENT comment

CONCLUSIONS

Overall, St William welcome and support the Council's positive and ambitious growth agenda, aligned as it is with a positive approach to design and placemaking and constructive policies for addressing sustainability and climate change issues. The changes suggested in these representations reflect the desire to ensure that the policy context positively encourages the delivery of development and, where appropriate, allows flexibility on a site by site basis, taking into account the viability of development.

St William look forward to working with the Council to bring forward the early development of the land at the National Grid site and engaging in the next stages of the Local Plan process.

Included files

Title Question: Any other comment

ID EGS15080

Person ID 1162751

Full Name Watford Borough Council

Organisation Details	Principal Planning Officer
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	Watford and Dacorum have been working collaboratively and welcome continued and constructive engagement with Dacorum Borough Council and the other South West Hertfordshire authorities on respective Local Plans and strategic planning matters, including the South West Herts Joint Strategic Plan. We envisage a Statement of Common Ground can be agreed with Dacorum on these matters prior to the submission of the Local Plan for examination.
Included files	
Title	Question: Any other comment
ID	EGS15081
Person ID	1261425
Full Name	Camilla Pascucci
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	1 The timing of this consultation during a worldwide pandemic and national lockdown has disenfranchised the public. In particular, not allowing full access to the many people who do not have internet access. The DLP document is too large to access and navigate on mobile devices, which is what the majority of the public will be using to

The only other available option is to make an appointment to visit the library to see the documents. However, our government has told the public to 'Stay at Home to Save Lives'. Few will choose to risk their lives by booking in to view the DLP at the library.

Included files

Title Question: Any other comment

ID EGS15141

Person ID 1270940

Full Name

Organisation Details CERDA PLANNING (ON BEHALF OF BOVINGDON PARISH COUNCIL)

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment Whilst it is acknowledged that the Development Strategy that is being promoted within the Emerging LP will inevitably require the release of land from the Green Belt, including the land at Grange Farm in Bovingdon, it should be reiterated that, in general, BPC is opposed in principle to the release of such land in advance of the redevelopment of previously-developed land which should be preferred in the first instance and as required by Government guidance in the NPPF.

That said, it is acknowledged that the Borough Council has a difficult task in that regard with a significant proportion of the Borough being covered by the Green Belt, and the release of Green Belt land around the most sustainable urban areas and other settlements in the Borough should always be undertaken in the first instance.

Included files

Title Question: Any other comment

ID EGS15162

Person ID 1270945

Full Name

Organisation Details NORTHCHURCH PARISH COUNCIL

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS15163
Person ID	1270945
Full Name	
Organisation Details	NORTHCHURCH PARISH COUNCIL
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, requires Dacorum Borough Council to notify residents and other persons carrying on business. Dacorum's consultation process does not comply with these regulations. On the contrary, many people in Northchurch have either not heard of the consultation or have no means of responding.</p> <p>Many homes in Northchurch did not receive Dacorum's brochure. During the extended period of the consultation, residents from Northchurch and surrounding streets, including some parish councillors have told us that the brochure has not been delivered to their street including Granville Road, Cowslip Meadow, Lyme Avenue, The Meads, Darrs Lane, Northchurch High Street, Tring Road, Covert Road, Covert Close, Compass Point, New Road, Wharf Lane, South Bank Road, Chaucer Close, Kings Road Berkhamsted, Westfield Road, Durrants Lane, Pages Croft, Haynes Mead, Bridle Way, Edlyn Close and Winston Gardens. Additionally, the hard copy directs residents to the DBC website but does not provide the full information required for a resident to a return a meaningful response.</p>

Northchurch has a high percentage of elderly residents who do not access information online or via social media and know little of nothing about Dacorum's plans. Many residents do not have access to the devices that they need to consult the documents and are therefore excluded. Journeys to libraries are non-essential, unlawful and cannot reasonably be advised. In normal circumstances, Northchurch parish councillors would distribute leaflets detailing the plans for Northchurch to all our households, but Lockdown rules have prevented us doing this. One example from an elderly local man illustrates the difficulties faced by elderly and disabled residents:

"I moved area in 1959 and took part in a consultation on building on the field behind Chaucer Close at that time by attending a meeting in Sunnyside Church Hall. But I have not received any information notifying me of the current consultation. I have no IT. I cannot travel to a library because I am disabled, and I live alone. I would like to participate in the consultation, but it is not possible because the current lockdown restrictions say I should only do essential journeys."

Meaningful consultation would reveal that virtually everyone in Northchurch believes that Dacorum's Plan does not recognise Northchurch and does not meet the needs or aspirations of local people. It will undermine their quality of life, harm their physical and mental wellbeing, and cause irreparable damage to the Green Belt. Northchurch Parish Council would like this plan to be withdrawn and replaced with a new plan based on an up-to-date assessment of housing needs that reflects the views of the people of Dacorum.

In conclusion the Local Plan:

- Is unknown to many residents due to lockdown restrictions
- Is deeply unpopular with those residents who are aware of it
- Uses out-of-date, 2014 housing projections which are much higher than current projections
- Prioritises housing targets above the Green Belt, climate change, sustainability, biodiversity and public health
- Does not meet the need for social housing
- The population increase in Northchurch (over 50%) will cause overcrowding and congestion
- Will destroy 40 acres of Green Belt in Northchurch, and 21,000 acres across Dacorum
- Is not compatible with the Sustainability Appraisal
- Will damage the River Bulbourne
- Will harm the physical health and mental wellbeing of local people
- Fails to protect the distinct community, history and rural character of Northchurch
- Allows Northchurch to 'sprawl' into Berkhamsted
- Fails to maximise the use of brownfield land for housing
- Fails to provide the infrastructure needed to cope with increased demand
- Fails to provide each development with a traffic management plan

Included files

Title Question: Any other comment

ID EGS15179

Person ID 1270993

Full Name	MRS MERRIL TRUEEMAN
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS15189

Person ID	1270998
Full Name	PAUL HARRIS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment

ID	EGS15200
Person ID	1142578
Full Name	Mr Norman Brooks
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).:-</p>

Included files	
Title	Question: Any other comment
ID	EGS15229
Person ID	1271006
Full Name	Ms Zoe Wiggins
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Having lived in this town my entire life I have witnessed the removal and deconstruction of practically all of the best adult/family entertainment venues in this town - the Pavillion, countless pubs that hosted live music as well as social clubs, nightclubs, bars, arcades, swimming centres, bowling, pool halls, Quasar, and many others. To compound this, the population has grown significantly already and the residents are feeling it.</p> <p>Not planning to provide social activities for residents is highly detrimental to people's mental, physical and social health. Planning to increase the population of the borough by an additional 50,000+ people without planning for these improvements will compound this issue even further. Residents need to be provided with a wide variety of options for things to do. There's only so many times you can go for a meal and head to the cinema.</p> <p>High streets should no longer be focused purely on shopping, which is being driven out by online shopping, and instead should offer a range of entertainment venues for residents. This will provide jobs and bring high streets to life. Entertainment venues should be suitably sized. The Old Town Hall has a capacity of around 100 people. This is not suitable to cater for a growing town which will soon have a population to rival cities. Entertainment venues can cater for local groups such as amateur dramatics, local music festivals, open mic nights and then have the potential to draw in larger acts in terms of comedians, musicians and bands, theatre productions, etc.</p> <p>After COVID, people will be craving and valuing these facilities more than ever before.</p>

Growth is not compatible with sustainability. A simple and very basic fact. The Earth is finite.
 Our housing needs are changing as the population ages and this should be reflected in all future plans. The number of new houses proposed in the plan should be substantially reduced.

Dacorum should implement a local plan that includes firm and ambitious sustainable commitments.

Included files

Title Question: Any other comment

ID EGS15235

Person ID 1271006

Full Name Ms Zoe Wiggins

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
 * Yes
 * No

QUESTION ANY OTHER COMMENT comment Additionally, some people that I know received a leaflet through the door regarding the local plan. However, an equal amount of people I spoke to did not receive this - it is suggested this is picked up with your distribution company!

Included files

Title Question: Any other comment

ID EGS15252

Person ID 1271086

Full Name MRS PATRICIA BEL-BARKO

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of detennining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS15270
Person ID	1271104
Full Name	ALISON BRAITHWAITE
Organisation Details	
Agent ID	
Agent Full Name	

Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	I don't believe the consultation has been fair as I have not received, along with numerous other residents, the information packs some households have received. I do not receive free local papers and during the lockdown have not been out to see any information that may have been available (ie library). Luckily I have access to the internet and saw this information on Facebook but strongly feel something of this importance should have been more widely distributed, after all not everyone has access to the internet and with homeschooling lots of tools/time has been taken up. Therefore I believe the consultation period should be extended to ensure all residents are consulted and have time to respond.
Included files	
Title	Question: Any other comment
ID	EGS15277
Person ID	1271103
Full Name	GRAHAM RITCHIE
Organisation Details	FAIRFAX STRATEGIC LAND (HEMEL) LTD
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>Representations Submitted on behalf of Fairfax Strategic Land (Hemel) Ltd</p> <p>We refer to the above consultation exercise and respond on behalf of our client, Fairfax Strategic Land (Hemel) Ltd, setting out a number of representations upon the Dacorum Local Plan Emerging Strategy for Growth (2020 – 2038) Consultation (the Emerging Strategy), including in relation to the omission of land located west of Piccotts End,</p>

Hemel Hempstead (LPA Site Assessment Ref HH69) as a housing allocation for up to 400 dwellings in helping to meet identified housing needs during the plan period.

The following plans and documents are submitted in support of our representations:

- Site Location Plan 1920-PL01 Rev A
- Indicative Site Layout 2037-PL04 Rev.G
- Landscape Assessment (Hyland Edgar Driver) (Feb 2021)
- Green Belt Assessment (CSA Environmental) (Feb 2021); and
- Highways and Accessibility Technical Note: Suitability of Land west of Leighton Buzzard Road, Hemel Hempstead and Analysis of Draft Housing Allocations (SK Transport) (Feb 2021).

The content of the supporting plans and particulars is set out below where relevant to the particular issue/discipline being addressed.

Land located to the west of Piccotts End, Hemel Hempstead is controlled by Fairfax Strategic Land (Hemel) Ltd extends to approximately 26ha (Site Assessment Ref HH69) and could provide for up to 400 dwellings.

The land comprises an available, suitable and deliverable opportunity to accommodate housing needs (both market and affordable), in a sustainable location, within the industry standard recommended walking and cycling distances from local services and facilities, including the significant retail, employment, community facility and leisure offer available in the town centre.

In addition, the ability to extend existing bus services into the site further serves to underpin the site's excellent sustainability credentials.

Development of the site for housing provides the opportunity to create a new planned expansion to Hemel Hempstead, and will include a CIL payment and/or commuted sum to be secured through a site-specific planning obligation to enhance the overall offer at Rossgate local centre; thus benefiting the wider community with an enhanced social offer.

The site's proximity to existing local centre, other local facilities as well as Hemel Hempstead town centre demonstrates the sustainability merits of the site for housing when set against the Council's on-going housing need.

A bus stop and turning loop has also been incorporated into the Indicative Site Layout, the provision of which has support from an established local bus provider having and they have confirmed they are willing to use the loop should permission be granted.

Notwithstanding the location of the site within the Green Belt, the character of the site is heavily influenced by the suburbs of Gadebridge, Piccotts End and other surrounding development including the electricity sub-station and garden centre beyond to the north.

The site offers the opportunity to provide a material contribution to the Borough's pressing and on-going housing need and do so in an appropriate manner without impacting upon the wider countryside surrounding Hemel Hempstead. As explained later in these representations, the site is ideally located to be brought forward for development in the early stages of the plan period, and/or in helping to meet a shortfall in the five year supply of deliverable land.

The land has inherent sustainability merits which make it suitable for residential development, and in our view represents a development opportunity providing a logical rounding off to the north of Hemel Hempstead with limit impact upon both the landscape and Green Belt purposes.

For the reasons set out in our submissions there are a number of fundamental shortcomings with the approach to site selection in the Emerging Local Plan Strategy that result in the need for amendments if it is to satisfy the tests of soundness at paragraph 35 of the NPPF.

Based on our assessment of the evidence base that has been used by the Council to underpin the approach to site selection, the Emerging Strategy cannot be said to be justified in so far as it fails to represent an appropriate strategy and nor does it adequately take account of the reasonable alternatives.

This is particularly the case for the approach to site selection at Hemel Hempstead.

We have undertaken a comparative analysis of the draft allocations proposed by the Council, including the 3 no. draft site allocations at Hemel Hempstead, comprising HH-h1b – North of Hemel Hempstead (phase 1), HH-h1b – North of Hemel Hempstead (phases 1 and 2) and HH-h2 – North of Gadebridge (Land at Piccotts End) and conclude that on a proper consideration of the evidence base the Emerging Strategy should have identified our client’s land at Piccotts End as a housing allocation(s).

Our representations focus on specific parts of the Emerging Strategy as follows:

- **Policy SP4: Delivering the Housing Strategy**

The consultation draft Local Plan sets out a need to plan for a significant level of growth, including in the form of urban extensions and Green Belt releases. This includes a significant amount of planned growth at Hemel Hempstead. The spatial strategy has purportedly been informed by a number of evidence base documents. They include, but are not limited to:

- Housing Topic Paper
- Site Selection Topic Paper
- Site Assessment
- Sustainability Appraisal
- Green Belt Study
- Highway Studies

Our detailed representations are set out below and include submissions in response to the content of these evidence base documents, including, inter alia, the Site Assessment (prepared by AECOM alongside the Topic Paper) and the Sustainability Appraisal (“SA”).

Included files	ORG Fairfax Strategic Land Hemel Ltd - Agent Steven Brown Woolf bond Planning reps_Redacted.pdf
Title	Question: Any other comment
ID	EGS15302

Person ID	1161497
Full Name	Mr Robert Sellwood
Organisation Details	The Crown Estate
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	The views of The Crown Estate on the content of the Reg 18 Local Plan are fully set out earlier in this document and in the accompanying covering letter.
Included files	
Title	Question: Any other comment
ID	EGS15317
Person ID	1250151
Full Name	Andrew Marsh
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>In preparation of the Regulation 19 Draft Local Plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.</p> <p>Please note that absence of a comment on a policy, allocation or document in this letter does not mean that Historic England is content that the policy, allocation or document is devoid of historic environment issues.</p>

Finally, we should like to stress that this response is based on the information provided by the Councils' in this consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment.

If you have any questions with regards to the comments made then please do get back to me. I would be very happy to meet to discuss these comments further. In the meantime we look forward to continuing to work with you and your colleagues.

Included files

Title Question: Any other comment

ID EGS15323

Person ID 1265045

Full Name Joanne Loch

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

I am also very concerned that many of us have been unaware of the full extent of the situation, and if they knew would be equally as appalled.

People have not always got the time, energy, or means to stand up against such political decisions. Yet this seems even more under-hand as this has been pushed through during a time of national pandemic, when people have been asked to stay at home, shield, isolate and are generally suffering the blow to both physical and mental health. Communication means have not been normal and we have all had many other concerns to face during this period. This feels as though things are moving forward with very little consultation, as during this year of pandemic, people have needed to focus on problems within their own households, not having the ability to socialise and therefore learn of the local news, and no time to research into any rumours that we might have heard about proposed building. This is not giving residents of Northchurch, Berkhamsted and Tring and surrounding areas enough time nor ability to respond.

I want to know exactly how many acres of Greenbelt land would be lost, and how much our population would increase. There needs to be honesty and transparency in these proposals, and the opportunity for each and every resident to have their say.

Please can you reconsider this proposal for development and look at the impact on your beautiful towns and villages and the people that live in them.

Included files

Title Question: Any other comment

ID EGS15335

Person ID 1271161

Full Name Philippa Seldon

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I am writing to add my firm support to Councillor Lara Pringle's proposal 'to withdraw the consultation, revise the proposals and consult the public at a time and in a manner when the consultation can be fully inclusive, accessible and fair to all of our residents'

Included files

Title Question: Any other comment

ID EGS15351

Person ID 1271220

Full Name MAUREEN RUMSEY

Organisation Details

Agent ID

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS15359
Person ID	1145662
Full Name	Mrs Catherine Anderson
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS15369
Person ID	1149688
Full Name	Lynda Hobley

Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>I wish to protest about holding the public “virtual” consultation on the above contentious issue <i>in the middle of a major pandemic!</i> It has not been given much publicity – I only heard of it via word of mouth and local private mail drops. Due to a lack of IT knowledge/equipment (mine does not support viewing maps, etc on your site) a huge swathe of the local population is excluded and from the little</p> <p>I've seen, the current population of Tring has been grossly understated on the documents. The DBC web site is complicated, not user friendly, requires registration and up to date IT knowledge to navigate - these issues, together with severe restrictions on attendance, make the whole process totally undemocratic and dictatorial. A common pattern when the Council/Government wish to push changes they know to be unpopular, unwanted and controversial! (Personally I believe the plans have already been privately agreed by the Housing Minister & Council members and this public consultation merely a pretence to add credence when final decisions are announced) I will try to make my objections as brief as possible.</p>
Included files	
Title	Question: Any other comment
ID	EGS15375
Person ID	1271232
Full Name	MR & MRS P J TAYLOR
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes

QUESTION ANY OTHER COMMENT comment	<p>I} We have only just found out about the plan as we have not received anything in the post to tell us that the consultation was taking place and like many of our contemporaries do not take part in social media.</p> <p>We have still not had access to any of the documents which I understand are only available on-line or in the local library which we cannot access, and so we have not had a fair chance to examine the proposals.</p> <p>Relatives have been able to provide us with some of the information we need.</p>
Included files	
Title	Question: Any other comment
ID	EGS15401
Person ID	1271257
Full Name	Mr Alastair Hogben
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt Land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p>

If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).

Included files

Title Question: Any other comment

ID EGS15415

Person ID 1259631

Full Name Fay Copestake

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment I propose that there needs to be further preparation and improved consultation. There are specific targets to be met including more brownfield building land assessments, and greater sensitivity regarding protection towards the surrounding green belt environment and its wildlife.

I do not agree with such numbers of properties being built and feel that this needs to be looked at again.

Included files

Title Question: Any other comment

ID EGS15419

Person ID 1271261

Full Name Gavin and Victoria Rees

Organisation Details

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<p>1. <u>Legitimacy of the consultation</u></p> <p>The whole project has been deliberately inaccessible to the community that it will affect. Consultation has only been possible for those with online capabilities and a large number of elderly and vulnerable do not even know about the project, let alone have the capacity to make comment on it. In no way can their lack of comment be deemed as an acceptance or endorsement of the plans, in fact reflects their total unawareness of it.</p> <p>As a minimum, the consultation period should be extended beyond lockdown and when a majority of the area has received it vaccines, to allow the public the chance to view plans, in a way that is accessible to all, and to have a realistic opportunity and timescale to make comment on the proposed plans.</p>
Included files	
Title	Question: Any other comment
ID	EGS15441
Person ID	1271088
Full Name	MIKE WALTERS
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield</p>

land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.

Included files

Title Question: Any other comment

ID EGS15454

Person ID 350823

Full Name Mrs Sue Yeomans

Organisation Details Chairman
Chilterns Countryside Group

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes

* Yes

* No

QUESTION ANY OTHER COMMENT comment

The Chiltern Countryside Group (CCG) welcomes the opportunity to respond to Dacorum Borough Council's (DBC) Local Plan Emerging Strategy for Growth 2020-38 Consultation February 2021.

CCG is an independent local community Action Group established in 2008 with supporters throughout the Chilterns. Its mission statement is: '*Preserving the peace of the Chilterns*' and our response to this Consultation is made from that perspective.

The CCG is a member of the 'One Voice' Alliance and joins with these organisations in opposing the DBC Local Plan 2020-38 and in making this statement:

"We, the Chiltern Society, Chiltern Countryside Group (CCG), Grove Fields Residents Association (GFRA), Berkhamsted Residents Action Group (BRAG), Kings Langley & District Residents Association (KL&DRA), Berkhamsted Citizens Association and Tring in Transition as the 'One Voice' alliance, oppose the 'Dacorum Local Plan - Emerging Strategy for Growth' because:

1 *Whilst the policy on biodiversity is clear, the emerging plan is not explicit enough in terms of **how** Dacorum Council will work with developers and other stakeholders to mitigate Green Belt loss, increase biodiversity and meet National and Hertfordshire's goals for climate change and carbon reduction.*

1 *The proposed number of houses to be built should be significantly lower than the target to reflect **actual demonstrable need** for housing and the high proportion of Green Belt and AONB land in Dacorum, with a primary focus on affordable starter*

1 *A higher proportion of the houses should be built on brownfield land, or established through conversions, in the existing urban areas of Hemel Hempstead, Tring, Berkhamsted and Kings Langley, and **away from areas located in the Green Belt** (which should only be used in exceptional circumstances) and the Chilterns AONB and its*

While not members of the Alliance, the Chilterns Conservation Board and CPRE Hertfordshire are working closely as advisors to the One Voice alliance."

The Group submits its response below to each of the Questions posed in the Consultation.

CCG requests that the contents of its submission are taken fully into account by DBC in further consideration of the proposals contained within the 2020-2038 Local Plan (LP).

- The CCG finds that this Consultation has failed to meet consultation principles. The Consultation was announced in December 2020 and has been running during a period of Covid19 'lockdown', which has disenfranchised many residents, particularly the elderly, those without access to or skills with IT, the infirm and/or vulnerable.
- Meetings, both public and private are banned, travel is limited to the 'essential' and many people are 'shielding', which affects their ability to have proper, lawful access to We are advised that documents are available to view at local libraries, which have reduced opening hours, or by appointment at The Forum, Hemel Hempstead, but these are not viable options for someone who is medically 'shielding'. Distribution of the DBC leaflet, which 'markets' the LP, rather than providing detailed information, has been patchy and we are not confident that all DBC residents will have received this very basic pamphlet.

Included files

Title Question: Any other comment

ID EGS15477

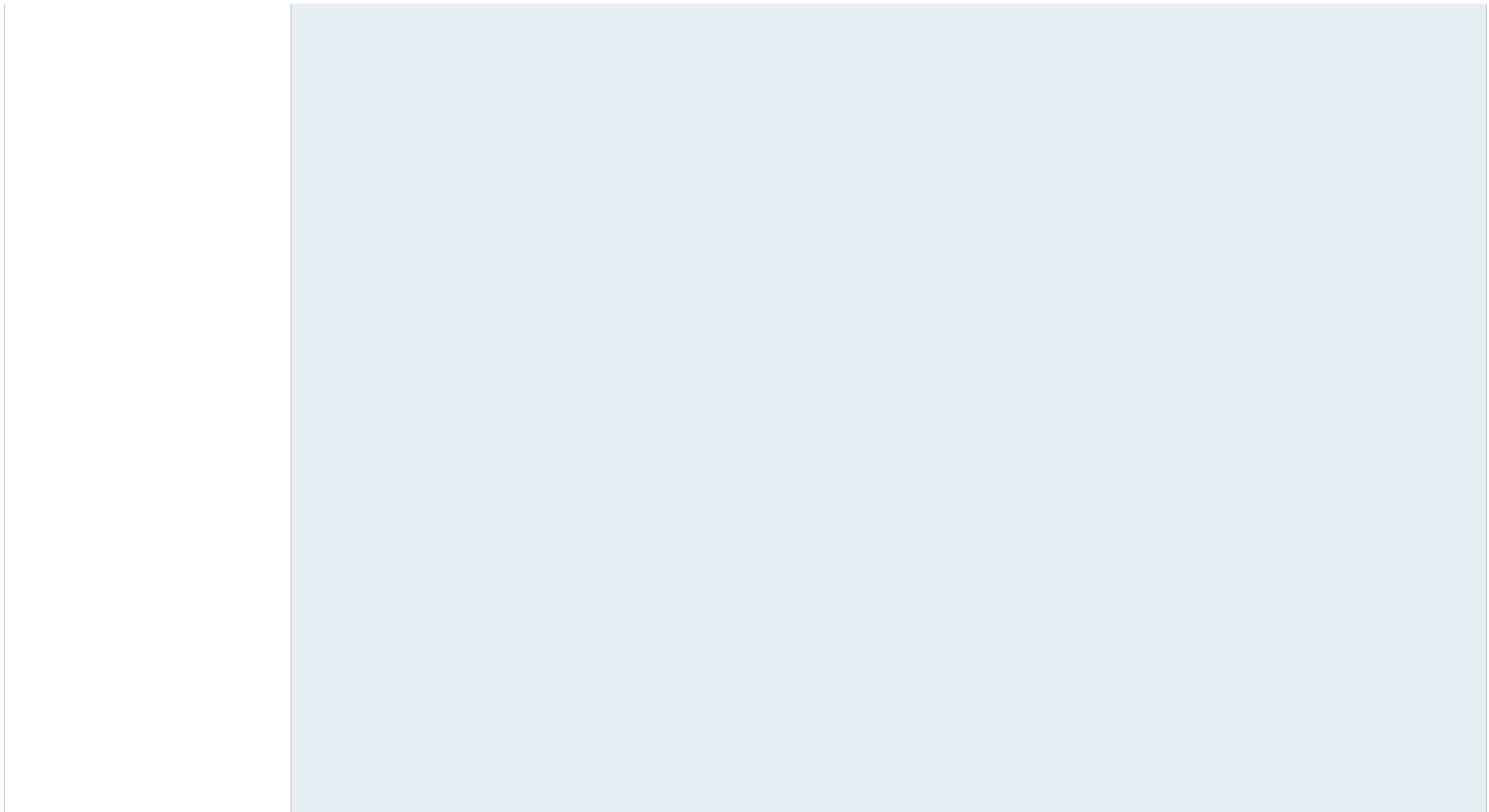
Person ID	1271381
Full Name	Alison Walker
Organisation Details	Associate Director of Strategic/Large Projects Thakeham Homes
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<ul style="list-style-type: none"> • These representations have been prepared by Turley on behalf of our client, Thakeham Homes Ltd (Thakeham), in respect of the current consultation on the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth • Thakeham is promoting Land east of Berkhamsted (known as ‘Bulbourne Cross’) as a new sustainable neighbourhood comprising circa 1,000 homes, circa 32 acre sports hub, a primary school, a country park and a village centre including shops, offices, a community hub and village green with pavilion and supporting infrastructure as an alternative to Dacorum Borough Council’s (the ‘Council’) proposed growth • Each of our responses relates to a particular policy or paragraph and this report is structured This Statement is supported by the following documents: <ul style="list-style-type: none"> • Bulbourne Cross Evolution Document, February 2021 • Bulbourne Cross Green Belt Technical Note, February 2021 • Bulbourne Cross Initial Baseline Landscape & Visual Appraisal, February 2021 • Bulbourne Cross Effect on AONB Technical Note, February 2021 • Initial Transport Appraisal, February 2021 • Statement of Community Engagement, February • It is understood that a further round of consultation will be held on the Local Plan prior to its proposed submission to the Secretary of State. We look forward to continuing to engage with the Local Plan process and would welcome the opportunity for further discussions with the Council to discuss our representations and the opportunity which Bulbourne Cross represents.

- Thakeham does not just build houses; Thakeham is a zero carbon, infrastructure-led community creator and is committed to delivering new, extraordinary places, where the highest attention to detail makes a positive difference.
- Thakeham builds for the future, for communities and for Each development is different and tailored to its locality, with careful consideration of the area's character, as well as the environment. As a community creator first and foremost, Thakeham's commitment to improving on existing social landscapes and mental/physical wellbeing means its schemes are infrastructure led and zero carbon in terms of both design and construction ; engaging with transport, healthcare, utilities and other stakeholders from the start of a project. The delivery of new homes facilitates the delivery of physical, social, blue and green infrastructure which benefits the wider surrounding area, as well as the new residents, and ensures that Thakeham creates sustainable places to live, work and relax. At every stage, Thakeham's approach is one that ensures they leave a legacy behind that everyone can be proud of.
- Thakeham is the first housebuilder in the UK, and one of only five in the construction sector globally to have made commitments on the SME Climate Hub to join the United Nations' Race To Zero campaign. The commitment Thakeham has made joins Thakeham's already industry leading commitments that from 2025 all Thakeham Homes will be carbon neutral in production and zero carbon in lifetime use.
- Thakeham is one of only 12 organisations selected to become a member of the Healthy New Towns Network, which is a collaboration between NHS England, Public Health England, Housing Developers and Housing Associations. Thakeham is also a member of the Home Builders Federation, sitting on its Future Homes Taskforce as an exemplar business, for our leading work in Zero Carbon Placemaking. Thakeham has recently been acknowledged for its high-level commitment to advancing sustainability within the industry by the Supply Chain Sustainability School (SCSS). The award of Gold membership acknowledged Thakeham's use of the resources as a method of ensuring continuous sustainability improvement across the wider supply chain. Further details about Thakeham's different approach and commitments can be found in the Evolution Document that accompanies these representations.
- We support the Council's vision for the Borough which recognises the challenges and opportunities which exist over the Plan period to 2038. As emphasised by the Vision, to achieve this it will be critical that balanced communities are delivered with the homes, jobs and supporting infrastructure needed all to be

- Policy SP2 sets out the Council’s proposed Spatial Strategy and how this is to be Amongst other elements, the Policy identifies that the Plan will make provision for a minimum of 16,596 homes over the period between 2020 and 2038, equivalent to 922 homes per annum.
- On 16th December 2020 the Government published the results of its new Standard Methodology (following the previous consultation version in August 2020). This new Standard Methodology sets a minimum annual requirement for Dacorum of 1,023 dwellings per annum. Clearly whilst the Council was not able to reflect this in the current consultation version of the Local Plan, future iterations will need to respond to this increased minimum requirement and ensure the Local Plan is preparing to meet these needs.
- Accordingly Policy SP2 must be updated to include a requirement for provision of a minimum of 18,414 homes over the Plan period. Additional allocations will therefore be required in order to deliver the 1,818 additional dwellings now required over the Plan
- Thakeham is promoting Land east of Berkhamsted (known as ‘Bulbourne Cross’) as a new sustainable neighbourhood comprising circa 1,000 homes, circa 32 acre sports hub, a primary school, a country park and a village centre including shops, offices, a community hub and village green with pavilion and supporting infrastructure as an alternative to Dacorum Borough Council’s proposed growth
- As has been clearly demonstrated through the critique of the proposed allocations and comparison to Land east of Berkhamsted as set out in Section Two and Appendix One, the site represents a sustainable location for an extension to the town. The proposed development would provide significant benefits which can only be delivered through a development of a greater scale than proposed through the piecemeal approach to allocations that the Council currently proposes. The benefits of the vision for Bulbourne Cross are set out below and supported by the accompanying Evolution

1.7 The site should be proposed for allocation to help meet the needs of the Borough and proposed policy wording is provided at Section Four of this statement.

- We look forward to continuing to engage with the Local Plan process and would welcome the opportunity to discuss with officers the opportunity at Bulbourne Cross as well as our more detailed comments on the Local Plan as currently drafted



Included files	
Title	Question: Any other comment
ID	EGS15512
Person ID	400475
Full Name	Mr Michael Demidecki
Organisation Details	

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The current coronavirus pandemic has shown how important green spaces are for recreation and daily exercise. The proposal for such a high number of homes in Tr01, Tr02 and Tr03 will increase pressure on the existing greenspaces. One such green space is an existing wildlife site, Cow Lane Farm Meadows, which lies within Growth Area Tr01. There is an existing public footpath across these meadows from Station Road to the A4251. The footpath and meadow through which it runs should be left as is in view of its proximity to the heavy housing density planned nearby. Before further planning through the whole wildlife site should be subject to extensive survey at all times of the year. Several species of uncommon fungi for example have been noted on the site.</p> <p>Improving Station Road in the belief that the proposed additional housing will mean that more people will wish to commute to London may also be an incorrect assumption. I say this as it is likely that as a consequence of the coronavirus pandemic already more people have learned how to work from home. There are also local offices by the Court Theatre in Station Road which provide a base for home working.</p> <p>Where possible provision should be made for increasing areas suitable for pollinating insects by creating local native wildlife areas both near buildings and in land to be retained as green space. Wildlife sites though should not be altered.</p>
Included files	
Title	Question: Any other comment
ID	EGS15524
Person ID	1162394
Full Name	Grahame Senior
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No	Yes

<p>* Yes</p> <p>* No</p>	
<p>QUESTION ANY OTHER COMMENT comment</p>	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
<p>Included files</p>	
<p>Title</p>	<p>Question: Any other comment</p>
<p>ID</p>	<p>EGS15564</p>
<p>Person ID</p>	<p>1264530</p>
<p>Full Name</p>	<p>BRENDA AND ROY HURLEY</p>
<p>Organisation Details</p>	
<p>Agent ID</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	<p>The Emerging Local Plan is not suitable for examination. The further preparation of the plan requires substantial additional assessment to supplement the reconsideration of the evidence available; including more detailed assessment of housing supply requirements; the opportunities available for delivery within established settlement boundaries and the cross-border opportunities available within a Duty to Cooperate. It is clear that a substantial reassessment is required to inform an updated and better evidenced strategy. Exceptional circumstances have certainly not been identified in Framework terms so as to justify development of Green Belt land.</p> <p>It is considered that a reversion back to a strategy whereupon Hemel Hempstead take on the vast majority of housing need subsequently calculated through an objectively assessed needs assessment would provide a more appropriate provision of development for the borough, taking into consideration the socioeconomic and physical infrastructure associated with Hemel Hempstead; the greater opportunity for substantially increased density provision of brownfield land and the reduced cumulative impacts upon the Green Belt and the reduced environmental impacts upon tightly constrained settlements located elsewhere throughout the borough.</p> <p>If on completion of a satisfactory process of determining an objectively assessed need that it can be demonstrated against the expectations of Paragraph 137 of the Framework there is a requirement to allocate Green Belt land outside of the settlement of Tring, such a requirement should take into consideration the varying characteristics of the landscape surrounding the settlement and particularly its contribution towards the functionality of the Green Belt and its relationship with the Area of Outstanding Natural Beauty. In this regard greater consideration should be given to the density opportunities associated with a site or sites that can prove to be required to be brought forward for allocation, wherein for example, the current assessment of the opportunities available for site Tr01 Dunsley Farm, in its substantially reduced impact on the Green Belt by comparison to the sites East of Tring (Tr02 and Tr03).</p>
Included files	
Title	Question: Any other comment
ID	EGS15629
Person ID	1154177
Full Name	Nikki Hamilton
Organisation Details	Development Co-ordinator Herts & Middlesex Badger Group
Agent ID	

Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	Due to lock down we have had great difficulty trying to survey the suggested sites but completed 90% by close this afternoon. Unfortunately we had a major issue with your form that we needed to complete to email across to you. I could find no way whatsoever of adding a page and after completing the first three areas, every single time I started to type, the page would jump back up to the top so I could not see what I had just typed and would totally lose my train of thought. Instead of it taking me around an hour it's taken most of the evening as I had to keep scrolling down to see where I was and if I had typed certain road names correctly etcetera - I have taken a video and can send this on to you if required. It was hugely time consuming and very frustrating after all the time we have spent surveying. We would therefore like this matter to be raised and to ask for Dacorum to consider our findings, including the following paragraph which was missed from my first submission due to the page continuously jumping back to the top of the page – this paragraph should have followed
Included files	
Title	Question: Any other comment
ID	EGS15630
Person ID	1154177
Full Name	Nikki Hamilton
Organisation Details	Development Co-ordinator Herts & Middlesex Badger Group
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	Yes
QUESTION ANY OTHER COMMENT comment	The following paragraph which was missed from my first submission due to the page continuously jumping back to the top of the page – this paragraph should have followed Large site between Westwick Road and A414/M1 no issues currently.

'Large site between Westwick Road and A414/M1 no issues currently.' ... This should have then read ... The site inbetween Westwick Row and the A4147 and the area surrounding the A4147 in between the junction of Westwick Row and the M1 has had numerous badger fatalities (this can be confirmed from the badger road casualty density map which was completed by the Herts Environmental Record Centre) - this points to there being setts in the adjoining area. Unfortunately we were unable to complete surveys of the 2 woods due to lockdown, but it is important to note that should there be setts within the woods and the site is fully developed, this would result in an even larger increase in fatalities as the badgers would be isolated between the development and the A4147 and any subsequent foraging ground removed exacerbating the situation. We will fully survey the area and advise you as soon as possible of our findings, but would ask that should this be the case and development be pursued for this area, that you will allow us to work with you so that full mitigation can be put in place including corridors adjoining habitat, meadows are incorporated around the woodlands and that badger fencing is installed along the A4147 with any necessary tunnels to avoid an increase of fatalities.

Included files

Title Question: Any other comment

ID EGS15631

Person ID 1154177

Full Name Nikki Hamilton

Organisation Details Development Co-ordinator
Herts & Middlesex Badger Group

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION ANY OTHER COMMENT comment To make matters worse I was then unable to download your form so I copied the whole of my text and sent an email to yourselves in the allotted time as just draft text. I was then able to download the form as a pdf and sent that immediately after which is obviously much easier to read than the draft text version, unfortunately this was just after 11.59.

We indicated that with the majority of the sites we did not find major issues in regards to badgers; we have also indicated what sites would need mitigation. We do have a huge concern with the largest Tring site and have written about this in our submission in that a large corridor would need to run between the site and canal (width of field) across the length of

development. We also have a huge concern with the area north and north east of Hemel due to the amount of badger setts, a concern with the thin strip between residential areas at Leverstock Green and the area around the A4147.

We hope that our issues can be taken into account and that you will accept our submissions. Please advise if you would like me to forward the video on to you in regards to the issues with the form. We look forward to working with you on your emerging local plan.

Included files

Title Question: Any other comment

ID EGS15649

Person ID 1271978

Full Name JOANNA HARLEY

Organisation Details

Agent ID

Agent Full Name

Agent Organisation

Yes / No Yes
* Yes
* No

QUESTION ANY OTHER COMMENT comment

- 1 The Berkhamsted Town Council (BTC) recognises that there are a number of sites within the town which are likely to be proposed for development as part of the current and upcoming Local Plan process.
 - 1 Accordingly, the Council has given thought to and agreed a number of principles it would like to see adhered to and reflected in DBC policy as the specifics of the proposals are
 - 2 These principles are largely driven by the recognition that our commitment to action to address the climate emergency, must be carried through into practical measures and that we must not allow building which will further add to our town's carbon footprint or contribute to further environmental degradation.
 - 3 They are also driven by a desire to build strong and resilient neighbourhood communities within the town and to ensure that adequate infrastructure is in place to allow for a thriving public realm and good quality of life for existing and future
 - 1 The principles outlined in this paper are necessarily high level and we recognise that they will require translation into specific standards and detail. At this time, BTC wishes to place on record its aspiration that any new development should conform to the highest current standards of environmental sustainability and should promote integrated

4 The following comments relate primarily to new development as that is what is most likely to come through into the Local Plan but the principles could equally well apply to brown field development

Included files

Title Question: Any other comment

ID EGS15706

Person ID 1273151

Full Name Ms Megan Green

Organisation Details Senior Planner
Thakeham Homes Ltd

Agent ID

Agent Full Name

Agent Organisation

Yes / No

* Yes

* No

QUESTION ANY OTHER COMMENT comment

Site Specific Representations - Land at Fox Meadow, Bovingdon

Thakeham Homes Ltd ("**Thakeham**") is writing in respect of Dacorum Borough Council's ("**the Council**") Local Plan Emerging Strategy for Growth 2020-2038 Consultation (November 2020

– February 2021) ("**the draft Local Plan**"), specifically in relation to the Land at Fox Meadow, Bovingdon ("**the Site**") which Thakeham proposes should be included as an allocation for residential development in the emerging draft Local Plan. These representations also raise significant concerns with the Council's approach to growth in Bovingdon as well the proposed site allocations. A site location plan is included in Appendix 1, together with a Vision Document (in Appendix 2) demonstrating the suitability of the Site and how Thakeham intends to deliver a tailored development for Bovingdon. A Statement of Community Involvement is included as part of this submission under Appendix 3.

About Thakeham

Thakeham is a zero carbon, infrastructure-led community creator, committed to delivering extraordinary places, where the highest attention to detail makes a positive difference.

Thakeham builds for the future, for communities and for individuals. Each development is different, with careful consideration of the area's character, as well as the environment. As a community creator first and foremost, Thakeham's

commitment to improving on existing social landscapes and mental/physical wellbeing means its schemes are infrastructure led and zero carbon in terms of both design and construction. Thakeham engages with transport, healthcare, utilities and other stakeholders from the start of any project. Our delivery of new homes goes hand in hand with the delivery of physical, social, blue and green infrastructure, benefiting the wider surrounding area, new and existing residents, and ensuring that Thakeham creates sustainable places to live, work and relax. At every stage, Thakeham's approach is one that ensures they leave a legacy behind that everyone can be proud of.

Thakeham is the first housebuilder in the UK, and one of only five in the construction sector globally to have made commitments on the SME Climate Hub to join the United Nations' Race To Zero campaign. The commitment Thakeham has made joins Thakeham's existing commitments that from 2025 all Thakeham Homes will be carbon neutral in production and zero carbon in lifetime use.

Thakeham is one of only 12 organisations selected to become a member of the Healthy New Towns Network: a collaboration between NHS England, Public Health England, Housing Developers and Housing Associations. Thakeham is also a member of the Home Builders Federation, sitting on its Future Homes Taskforce as an exemplar business, for our leading work in Zero Carbon Placemaking. Thakeham has recently been acknowledged for its high-level commitment to advancing sustainability within the industry by the Supply Chain Sustainability School (SCSS). The award of Gold membership acknowledged Thakeham's use of the resources as a method of ensuring continuous sustainability improvement across the wider supply chain. Further details about Thakeham's different approach and commitments can be found in the Vision Document that accompanies these representations.

These representations are split into the following sub-sections;

- Overarching Vision for Dacorum's Growth by 2038
- Vision for Bovingdon and Bovingdon Delivery Strategy
- Chesham Road/Molyneux Avenue
- Grange Farm
- Land at Fox Meadow

Conclusion

These representations incorporate Thakeham's comments on both the draft Local Plan Guiding Development policies and the proposed site allocations within Bovingdon. As demonstrated above within these representations, Thakeham raises concerns to the Council's approach to growth in the Borough, especially in Bovingdon, as well as identifying issues with the deliverability of the Council's proposed Bovingdon site allocations.

Thakeham respects the sensitive nature of the removal of Green Belt sites and is of the view that, whilst removal is justified by the pressing need for new housing, sites need not only to provide new homes, but also new community facilities. Thakeham considers that the proposed Borough allocations are insufficient to meet the required housing need under the Government's standard methodology, and that additional sites need to be allocated for residential development across the Borough but specifically in Bovingdon to ensure Bovingdon continues to contribute to the overall housing stock in the same proportions as it has to date. Other than the provision of a new school (whose funding and timescale is unknown), there are no new community facilities proposed for Bovingdon in the current draft Local Plan. The two proposed allocations conflict with the vision for Bovingdon that is set out within the draft Local Plan.

As concluded by the Council's own assessment, the Site performs well on a number of identified criteria. Whilst the Council seems to be of the view that other sites are less constrained and perform better against the Sustainability Appraisal assessment, Thakeham has demonstrated in these representations that the two proposed Bovingdon allocations do not provide as many benefits as the Site, which considerably out-performs the two proposed site allocations.

Land at Fox Meadow, Bovingdon is available, suitable and achievable and able to deliver housing within the first five years of the plan being adopted. As demonstrated in the appended Vision Document, the Site can deliver a new high-quality sustainable development, with both new homes and community benefits. Thakeham is an environmentally focused developer that is committed to delivering high quality, sustainable developments.

Including the Land at Fox Meadow as an allocation within the emerging Local Plan would enable the Council to plan positively to help meet the housing needs of the Borough by delivering sustainable development with significant community benefits which will meet the Councils' Vision and spatial strategy aspirations.

We trust that these representations are clear, and we would be grateful for confirmation of receipt of our submission. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Included files

Title Question: Any other comment

ID EGS15722

Person ID 1273151

Full Name Ms Megan Green

Organisation Details Senior Planner
Thakeham Homes Ltd

Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	
Included files	
Title	Question: Any other comment
ID	EGS15725
Person ID	1250019
Full Name	Cllr Nick Hollinghurst
Organisation Details	
Agent ID	
Agent Full Name	
Agent Organisation	
Yes / No * Yes * No	
QUESTION ANY OTHER COMMENT comment	<i>This is additional to the 2 attempts I have already made to complete my response!</i>
Included files	